



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



SDMS DocID 2037774

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

To: Addressees

AUG 18 2003

Re: Malvern TCE Superfund Site
**Notice of Potential Liability and
Opportunity to Participate in Third Round *De Minimis* Settlement**

Dear Sir or Madam:

The purpose of this letter is to provide you with an opportunity to participate in a third round *de minimis* settlement, Administrative Order on Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041 ("AOC III"), relating to the Malvern TCE Superfund Site ("Site"). This settlement is offered by the United States Environmental Protection Agency ("EPA") under the *de minimis* settlement provisions of CERCLA, including Section 122(g), 42 U.S.C. § 9622(g).

This letter also: (1) shall provide you with information concerning recent cleanup efforts at the Site; (2) notify you that your company may be potentially liable for contamination at the Site pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9607(a); and (3) inform you of future steps in the settlement process. A list of recipients of this AOC III *De Minimis* offer letter is attached as Enclosure "A."

1. ***Site Background***

CERCLA, more commonly known as Superfund, has several key objectives including setting priorities for cleanup of the worst hazardous sites in the country, and, determining the parties potentially responsible for investigating, cleaning up or paying the costs of cleaning up such hazardous sites. These parties are referred to as "potentially responsible parties" or "PRPs."

On October 14, 1992, the United States Environmental Protection Agency ("EPA") included the Site on the National Priorities List ("NPL"), a list of the most serious uncontrolled or abandoned sites at which releases of hazardous substances have occurred or may occur. For a more detailed discussion of the Site background, please see Enclosure "B."

For the purposes of this letter, the term "you" shall refer to either an individual, a company, a partnership, a sole proprietorship, a corporation, and or the successors, assigns, or heirs of any of the aforementioned legal entities, whichever is applicable.

Customer Service Hotline: 1-800-438-2474

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2. *Notice of Potential Liability*

Some recipients of this letter may have previously received a notice advising them of their potential liability regarding the Site. Other recipients of this letter may not have previously received a notice advising them of their potential liability with respect to the Site. This letter shall serve as notification of your potential liability to the extent that such notice has not been previously provided.

For each recipient of this letter that has not previously received a notice of liability, EPA has enclosed (Enclosure "G") Site documents that refer to transactions of each such recipient with the Site. EPA has evaluated this information and has determined that you may be a PRP for this Site. PRPs under CERCLA include: 1) current owners and operators of the site; 2) owners and operators of the site at the time hazardous substances were disposed; 3) persons who arranged for disposal or treatment of hazardous substances sent to the site; and 4) persons who accepted hazardous substances for transport to the site, and who selected the site for disposal. These categories are set forth in Section 107 of CERCLA, 42 U.S.C. § 9607.

EPA has documented the release or threatened release of hazardous substances, pollutants or contaminants at or from the Site, as those terms are defined in Sections 101(14) and 101(33) of CERCLA, 42 U.S.C. §§ 9601(14) and (33). EPA has spent, or is considering spending, public funds on actions to investigate and control such releases or threatened releases at the Site.

EPA may order PRPs, or any one of them, to perform response actions deemed necessary by EPA to protect the public health, welfare or the environment. Additionally, PRPs may be liable for all costs incurred by the government in responding to any release or threatened release at the Site, under Sections 104 and 107(a) of CERCLA, 42 U.S.C. §§ 9604 and 9607(a), and the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§ 6901 *et seq.*, and other laws. Such actions and costs may include, but are not limited to, conducting a Remedial Design Remedial Action, and other investigation, planning, response, oversight, and enforcement activities related to the Site. Such persons may also be liable to other persons who have spent their own money performing cleanup actions at the Site. In addition, PRPs may be required to pay for damages for injury to, destruction of, or loss of natural resources, including the cost of assessing the amount or extent of such damages related to a site. Each responsible party may be jointly and severally liable for the entire cost of cleanup.

You should also be aware that once a site is placed on the NPL pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, it cannot be deleted until after a Remedial Investigation Feasibility Study has been completed and the necessary remedial action has been conducted in accordance with EPA guidance and the National Contingency Plan, published at 40 C.F.R. Part 300.

By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you to perform or to finance voluntarily those response activities that EPA determines to be necessary at the Site.

1. ***"De Minimis" Settlements***

This letter also serves as notice to all parties listed on Enclosure "A" ("AOC III De Minimis Settlement Offerees") of the opportunity to participate in a *de minimis* settlement with EPA in connection with the Site. Based on EPA's review of the records pertaining to the Site, you appear to be responsible for a relatively small amount of hazardous substances at the Site. Therefore, you are being offered this opportunity to settle as a *de minimis* party.

Pursuant to CERCLA, 42 U.S.C. § 9601, *et seq.*, EPA has conducted and overseen a number of activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants, and/or contaminants into the environment, described above and in Enclosure "B."

Under Section 122(g) of CERCLA, EPA may offer special settlements to *de minimis* PRPs. Any party who settles its liability to the United States pursuant to this *de minimis* settlement will not be required to perform Site cleanup work. Instead, the *de minimis* settlor will pay an amount calculated by EPA to represent that party's proportionate share of costs already incurred and to be incurred at the Site, plus a premium, which accounts for, among other things, uncertainties in the costs of work not yet performed. In exchange for this cash payment, EPA will agree not to sue or take other civil action against the *de minimis* settlor with regard to this Site and will provide the *de minimis* settlor with contribution protection (see discussion in Section 3.B.3), subject to the settlor's compliance with the terms of the settlement.

EPA previously entered into two *de minimis* settlements relating to the Site. EPA entered in an Administrative Order on Consent for De Minimis Settlement, Docket No. III-98-074-DC ("AOC I") with 150 *de minimis* parties, effective on September 28, 1999, in connection with the Site. EPA entered into Administrative Order on Consent for De Minimis Settlement, Docket No. III-CERCLA-03-2001-0381 ("AOC II") with nine *de minimis* parties, effective June 11, 2002.

The enclosed third Administrative Order by Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041 ("AOC III") (Enclosure "C") sets forth the terms for concluding your liability to the United States for response costs incurred or to be incurred under CERCLA. EPA has released this AOC III for your signature. This opportunity to settle under the terms described herein is being offered for a limited time. **EPA will accept your signature on the AOC III through close of business September 10, 2003.**

In order to assist you in your review of the specific terms of the Malvern TCE Superfund Site *de minimis* settlement offer, the following information is provided:

A. **De Minimis Settlement Eligibility**

1. **Small Waste Contributors**

PRPs may be eligible for *de minimis* settlements if such parties contributed a minimal amount of hazardous substances, in comparison to other hazardous substances at the Site.

In addition, the toxicity or other hazardous effects of the hazardous substances contributed by a PRP to the Site must not be significantly greater than that of other hazardous substances at the Site.

2. Volumetric Ranking Summary

Small waste contributors eligible for *de minimis* settlement have been identified by EPA by utilizing volumetric ranking summaries prepared for the Site. EPA has prepared a volumetric ranking summary, dated July 29, 2003 ("AOC III VRS"), setting forth waste-in and *de minimis* payment amounts for proposed AOC III PRPs, for use in connection with this proposed AOC III. For ease of reference, the AOC III VRS (which is Appendix "D" of the AOC III) is attached as Enclosure "D." Similarly, EPA prepared volumetric ranking summaries for use in connection with AOC I and AOC II.² AOC I VRS and AOC II VRS are attached to the AOC III (Enclosure "C" of this letter) as Appendices "C-1" and "C-2."

The volumetric ranking summaries, AOC I VRS, AOC II VRS, AOC III VRS, prepared by EPA for the Site were compiled using comprehensive Site documents, including invoices, bills of lading, shipping orders and manifests, obtained by EPA from Chemclene. See Enclosure "E," "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" ("VRS Overview and Methodology") and "VRS Explanation Sheet," for additional general information as to the methodology utilized and information contained in the summaries.

EPA has utilized the methodology described in Enclosure "E" when preparing AOC I VRS, AOC II VRS, and AOC III VRS.

The AOC III VRS provides, for each AOC III PRP, waste-in volume and percentage information for both the MPA and the FDA at the Site. Since all PRP waste into the Site was received and processed by Chemclene in the MPA, EPA has set the *de minimis* settlement eligibility cut-off at or less than .75% of the total MPA waste volume. Generator PRPs should refer to Generator Total Payment column in order to determine their total settlement payment. Broker/Transporter PRPs should refer both to the Generator Total Payment and the Broker/Transporter Payment, to the extent applicable, columns to determine their total settlement payment.

In accordance with the Small Business Liability Relief and Brownfields Revitalization Act, Public Law 107-118 ("Brownfields Act"), enacted in January 2002, parties that contributed less than 2 drums to the Site will be considered *de micromis* parties. The Brownfields Act provides for a limitation of liability for *de micromis* parties.

² Volumetric Ranking Summaries dated December 16, 1998 ("AOC I VRS") were utilized by EPA in connection with AOC I. Volumetric Ranking Summaries dated May 29, 2001 ("AOC II VRS") were utilized by EPA in connection with AOC II.

Based on on-going research and attempts to identify viable PRPs, additional parties have been identified as orphans for purposes of the third *de minimis* settlement. In addition, EPA's past costs at this Site have increased and are reflected in the AOC III VRS. The basic methodology for calculating the *de minimis* payments has not changed.

B. De Minimis Settlement Terms

1. De Minimis Settlement Payment

In order to participate in this settlement, each AOC III PRP must agree to pay the amount listed next to its company in the "Total *De Minimis* Payment" column on the AOC III VRS (Enclosure "D").

The total payment amount represents each AOC III PRP's FDA and MPA percentage contribution towards past costs incurred by EPA at the Site and estimated future costs to clean up the Site, plus a premium payment.

For purposes of this settlement offer, EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Superfund and by private parties is \$21,697,339.80. This amount includes \$5,302,459.63 in response costs incurred by EPA through June 25, 2002, \$359,739.17 in response costs incurred by DOJ through May 3, 2003, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Future Response Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00).

The premium payment is determined based upon a variety of factors specific to both the Site and the settlement. EPA has utilized a one hundred twenty-five percent (125%) premium for any AOC III PRPs that did not receive from EPA an offer to participate in AOC I. EPA has utilized a two hundred twenty-five percent (225%) premium for any AOC III PRPs that received from EPA an offer to participate in AOC I, but failed to participate in that settlement.

In order to determine an AOC III PRP's total *de minimis* settlement payment, EPA has divided costs associated with the FDA and the MPA and calculated total payment amounts for each of these areas.

EPA is in the process of reviewing information concerning the selected remedy for the Site, and in particular, for soil remediation at the FDA and groundwater remediation at the MPA. This review could have the effect of altering the selected remedy at the Site and of subsequently lowering or raising the projected future costs at the Site. Future changes to the remedy and consequential changes to the projected future costs associated with the Site, will have no effect on this settlement offer, except to the extent that total remedial costs exceed \$31.2 million. In the event remedial costs do exceed \$31.2 million, EPA has provided for a reopener of liability provision.

2. Covenant Not to Sue

EPA will provide each AOC III PRP with a covenant not to sue. This provision is a promise that EPA will not bring any future legal actions against you regarding the Site and the specific matters identified by the settlement, provided that EPA's information regarding the volume and toxicity of your wastes is correct.

3. Contribution Protection

EPA will provide each settling AOC III PRP with contribution protection. This provision offers you protection from being sued by other PRPs at the Site. Frequently, major waste contributors will sue small waste contributors to recover clean up costs. A *de minimis* settlement provides protection from such suits that extends to all issues covered by the settlement.

C. Information to Assist PRPs

1. Information about the Site

In addition to the information contained in this letter, key documents about the Site are available for your review at EPA's website www.epa.gov/arweb.

2. Other *De Minimis* Parties

In connection with the Site *de minimis* settlements, EPA is aware of the following who has served as a *de minimis* PRP representative:

Philip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
200 Market Street
Philadelphia, PA 19103-3291
(215) 299-2000

3. Other Site PRPs

EPA has identified PRPs at the Site that EPA has determined are not eligible for *de minimis* settlement and to whom this AOC III settlement offer has not been extended. These PRPs are those with an MPA % of greater than .75%. An address list, reflecting the names and addresses of all Site PRPs, including both *de minimis* and those not eligible for *de minimis* settlement, is attached (Attachment "F").

D. Form of the Settlement

This settlement offer is extended only to the addressees of this letter. **EPA will accept your signature on the AOC III through close of business September 10, 2003.** Executed signature pages may be sent to the following:

Joan A. Johnson, Sr. Assistant Regional Counsel (3RC41)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Once the parties have signed the AOC III, there will be a public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw its consent to the AOC III if comments received disclose facts or considerations that indicate that the AOC III is inappropriate, improper, or inadequate. If the comments received do not require modification of, or EPA withdrawal from, the AOC III, the effective date of the AOC III shall be the date upon which EPA issues written notice to the AOC III PRPs/Settlers.

If you already are involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this Site, you should not interpret this letter as advising or directing you to restrict or to discontinue any such activities. You should, however, report the status of those discussions or activities in your letter to EPA. The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

EPA has determined that some of the companies receiving this letter may be small businesses under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). Please see Enclosure "H" to this letter. This information has been provided for informational purposes only pursuant to EPA policy, and is not intended to influence any PRP's decision to enter into settlement negotiations pursuant to this letter.

If you have any questions relating to the foregoing, you may call Patrick Egan, Civil Investigator, at (215) 814-3167.

Sincerely,

Henry J. Sokolowski, P.E., Chief
Superfund Enforcement &
Federal Facilities Branch

Enclosures:

Enclosure A- AOC III De Minimis Settlement Offerees

Enclosure B - Site Background

Enclosure C - AOC III, with the following Appendices:

Appendix A - List of AOC III PRPs/Settlers

Appendix B - Site Map

Appendix C-1 - AOC I VRS

Appendix C-2 - AOC II VRS

Appendix D - AOC III VRS

Enclosure D - AOC III VRS

Enclosure E - Volumetric Ranking Summaries Overview and Methodology

Enclosure F - Comprehensive Mailing List

Enclosure G - Site Documents

Comprehensive Transaction Reports

Enclosure H - Small Business Regulatory and Enforcement Fairness Act Information
Sheet

cc: Patrick Egan (3HS11)
Joan A. Johnson (3RC41)
Charlie Root (3HS21)
Mark Stevens, Esq. (Chemclene Site Defense Group)

Enclosure A
AOC III De Minimis Settlement Offerees

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ENCLOSURE A
AOC III De Minimis Settlement Offerees

Accuracy Scientific Instruments Inc.	Philco Ford c/o Loral Space Systems, Inc.
Airline Hydraulics Corporation	Precision Arts Manufacturing, Inc.
Allister Manufacturing Co.	Princo Instruments, Inc.
Ametek, Inc.	Prodelin Inc.
Amp Corporation	R. C. Kletzing Inc.
Ark Products Co., Inc.	Sermetal Inc.
Athena Controls, Inc.	Shur-Kut Supply Corporation
Bishop Tube Co.	Solid State Scientific
C.K. Systematics, Inc.	Storm Weather Products
Camdel Metals Inc.	U.S. Environmental Services Inc.
Carvel Hall Inc. c/o Syratech	Waste Consulting & Brokerage Inc.
Chem Solv Inc.	Xynatech Inc.
Contamination Control, Inc.	
David K. Robson, Inc.	
E. Frank Hopkins Co.	
Emeco Industries, Inc.	
Fabric Development, Inc.	
Fairfax Cleaners	
Fergusson Solvents Company	
Frazer-Volpe Corporation	
FTC Hazardous, Inc.	
G.K. Garrett Corporation	
Glah Brothers, Inc.	
Gulf & Western Industries, Inc.	
High Energy Corporation	
Hulltronics, Inc.	
J&J Spill Services & Supplies, Inc.	
Keystone Transformer	
Kosempel Manufacturing Company	
Leeds & Northrup Company	
Lightman Drum Co., Inc.	
Malco Inc.	
Matheson Instruments	
McClarin Plastics, Inc.	
Model Finishing Co., Inc.	
Narco Avionics, Inc.	
National Metalcrafters, Inc.	
Ni-Chro Finishing Company	
Oxford Metal Products Co.	
Penn Airborn Product c/o Transicoil	
Penske V.D.A.	
Philadelphia Steel Drum Co., Inc.	

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Enclosure B
Site Background

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Enclosure B
Site Background

The Malvern TCE Superfund Site ("Site") is located at and near 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Pennsylvania.

From 1952 until 1992, Chemclene Corporation ("Chemclene") sold and reclaimed industrial cleaning solvents, including trichloroethene ("TCE"); 1,1,1-trichloroethane ("1,1,1-TCA"); perchloroethylene ("PCE," also called tetrachloroethene); and methylene chloride ("MEC"). These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then resold to customers for reuse, or resold to other customers. Chemclene utilized two areas of the Site as part of its operations, the Main Plant Area ("MPA") and the Former Disposal Area/Mounded Area ("FDA").

The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA") and, therefore, the resulting still bottoms are listed hazardous waste. Prior to 1975, Chemclene reportedly buried drums containing the still bottom sludges from the distillation process in the FDA, approximately 1,900 feet southwest of the main plant. The FDA consists of two unlined earthen pits, each approximately 30 feet by 50 feet by 15 feet deep. This area is currently secured by an 8-foot high chain link fence. The Mounded Area, located on the western edge of the FDA, is approximately 8 feet wide by 150 feet long.

Chemclene's activities at the Site have been linked to the presence of volatile organic compounds ("VOCs") in the ground water and soil at the MPA and the FDA and the groundwater of the adjacent Spring Ridge Property. These contaminants include TCE, PCE, 1,1,1-TCA, MEC, 1,1-DCE, among others, and are listed as hazardous substances under 40 C.F.R. § 302.4.

In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. At this time, Chemclene began sampling domestic wells in the immediate vicinity of the property. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources, now known as the Department of Environmental Protection, and Chemclene in June 1980 and July 1981. Analytical results revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds. TCE was detected in wells at concentrations up to 12,600 micrograms per liter ("µg/l"), far exceeding the Maximum Contaminant Level ("MCL") of 5.0 µg/l. The Site was listed on the Superfund National Priorities List in September 1983. The contaminated home wells were located south of the FDA, with several located in the Hillbrook Circle residential development. Chemclene furnished activated carbon filter units to twenty (20) residential wells within the Hillbrook Circle Development and conducted periodic sampling of home wells in accordance with its Domestic Well Management Plan until November 1994. In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of

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the home wells, after it was determined that Chemclene was not following the procedures outlined in its Domestic Well Management Plan. In August 1995, several of the filter systems were upgraded by EPA in response to analytical results from residential well samples that showed contamination was passing through the existing filters into the homes.

In addition to the installation of carbon filters, Chemclene conducted removal actions following the detection of soil and groundwater contamination in 1980. Debris and approximately 300 drums were removed from the FDA excavations, in a prolonged removal effort from 1981 to 1984. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility. Additional drums were removed from the Mounded Area in late 1990; however, contaminated soil was left in place.

Four underground storage tanks were removed from the MPA in 1986. Soil samples collected from below the excavation grade of the tanks exhibited elevated concentrations of TCE, PCE, and 1,1,1-TCA. In addition, elevated levels of VOCs were detected in soil gas samples collected outside the distillation building in the MPA. These contaminant levels are believed to be related to Chemclene's past practices of discharging contaminated condensate from the recycling distillation process directly onto the ground surface.

As an operating facility, Chemclene entered into a RCRA Corrective Action Order with EPA in 1987. A RCRA Facilities Investigation ("RFI") Work Plan was approved for the Site in 1989. In July 1992, Chemclene withdrew its RCRA Part B Application as a treatment and storage facility, and to EPA's knowledge stopped accepting waste solvents for reclamation.

Chemclene failed to complete the RFI and implement interim corrective measures. As a result, EPA began considering the Site under the Superfund remedial program in November 1993. All existing data was compiled and a report was developed entitled Data Summary Report, April 1995. Based on EPA's review of the existing information, data gaps were identified and EPA was unable to conduct a Human Health or Ecological Risk Assessment. Accordingly, EPA conducted a Remedial Investigation ("RI") to complete the necessary data gathering at the Site. The RI was completed in January 1997. EPA completed a Feasibility Study relating to the Site in June 1997. The Proposed Plan for a comprehensive Site clean up was issued in June 1997. In November 1997, EPA issued a Record of Decision ("ROD") selecting a final remedy for cleanup of the Site. Available information indicates that Chemclene ceased operations in the Fall of 1999.

In April 1998, EPA notified approximately 250 generator and transporter potentially responsible parties ("PRPs") of their eligibility for a potential Superfund *de minimis* settlement regarding the Site. Additionally, in May 1998, EPA issued Special Notice Letters to approximately 40 non-*de minimis* potentially responsible parties which notified them of their opportunity to resolve their liability with respect to the Site.

In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on

Consent, which became effective September 28, 1999. In December 1999, the U.S. District Court for the Eastern District of Pennsylvania entered a Remedial Design/Remedial Action Consent Decree ("RD/RA Consent Decree") between EPA and 35 non-*de minimis* parties ("RD/RA Consent Decree PRPs"). Among other things, the RD/RA Consent Decree PRPs agreed to implement the Remedial Design and Remedial Activity specified in the November 1997 ROD. In May 2001, EPA and nine additional *de minimis* parties entered into an Administrative Order on Consent, which became effective June 11, 2002.

In accordance with obligations set forth in the RD/RA Consent Decree, the RD/RA Consent Decree PRPs have commenced response actions at the Site. Among other things, the RD/RA Consent Decree PRPs have provided a public water supply to certain residences located near or adjacent to the Chemcene facility. In addition, the RD/RA Consent Decree PRPs have completed a pre-design investigation of the Site and are commencing remedial design activities.

In December 2002, a number of RD/RA Consent Decree PRPs filed a contribution action (the "Litigation") against a number of Site PRPs, including *de minimis* PRPs that have not entered into any *de minimis* settlements with EPA. The Litigation, Civil Action, No. 02-8964, is pending in the United States District Court for the Eastern District of Pennsylvania. In response to the Litigation, EPA has received requests from a number of *de minimis* defendants seeking to settle their alleged CERCLA liability at the Site.

Enclosure C
Administrative Order of Consent III

AR000365

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

IN THE MATTER OF:

**Malvern TCE Superfund Site
258 N. Phoenixville Pike
Malvern, Pennsylvania**

**U.S. EPA Docket No.
CERC-03-2003-0041**

**Proceeding under Section 122(g)(4)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. 9622(g)(4)**

**ADMINISTRATIVE ORDER ON CONSENT
FOR *DE MINIMIS* SETTLEMENT**

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IN THE MATTER OF:

**Malvern TCE Superfund Site
258 N. Phoenixville Pike
Malvern, Pennsylvania**

**U.S. EPA Docket No.
CERC-03-2003-0041**

**Proceeding under Section 122(g)(4)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. § 9622(g)(4)**

**ADMINISTRATIVE ORDER
ON CONSENT FOR *DE MINIMIS*
SETTLEMENT**

I. JURISDICTION

- A. This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U.S.C. § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).
- B. This Consent Order represents a third Administrative Order On Consent for *De Minimis* Settlement entered into by and between EPA and *de minimis* potentially responsible parties ("PRPs") for the Malvern TCE Superfund Site.
- C. This Consent Order is entered into voluntarily by and between EPA and each of the *de minimis* potentially responsible parties listed in Appendix "A" who have executed the attached signature pages ("AOC III Respondents"). Each AOC III Respondent agrees to undertake all actions required by the terms and conditions of this Order. Each AOC III Respondent consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.
- D. The AOC III Respondents agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.

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- E. This Consent Order was agreed to and executed by EPA and the AOC III Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order.
- F. EPA and the AOC III Respondents agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the AOC III Respondents in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the AOC III Respondents in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it.

II. STATEMENT OF PURPOSE

- 1. By entering into this Consent Order, the mutual objectives of the Parties are:
 - a. to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), that allows the AOC III Respondents to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site, subject to a reopener specified in Paragraph 31 below;
 - b. to simplify the remaining enforcement activities concerning the Site by reducing to the extent possible the number of parties involved in the Site;
 - c. to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the AOC III Respondents.

III. PARTIES BOUND

- 2. This Consent Order shall apply to and be binding upon EPA, and upon the AOC III Respondents, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any AOC III Respondent, including, but not limited to, any transfer of assets or real or

personal property, shall in no way alter such AOC III Respondent's responsibilities under this Consent Order.

IV. DEFINITIONS

3. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply:
- a. "AOC I" or "*De Minimis* AOC I" shall mean the Administrative Order on Consent, Docket No. III-98-074-DC, by and between EPA and certain *De Minimis* PRPs ("AOC I Respondents") that became effective on or about September 28, 1999, in connection with the Site.
 - b. "AOC I VRS" shall mean volumetric ranking summaries, dated November 30, 1998, prepared by EPA in connection with the AOC I. The AOC I VRS set forth each *De Minimis* PRP's volumetric shares and settlement amounts to be paid in order to participate in the AOC I. AOC I VRS is attached as Appendix "C-1."
 - c. "AOC II" or "*De Minimis* AOC II" shall mean the Administrative Order on Consent, Docket No. III-CERCLA- 03-2001-0381, by and between EPA and certain *De Minimis* PRPs ("AOC II Respondents") that became effective on or about June 11, 2002, in connection with the Site.
 - d. "AOC II VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC II. The AOC II VRS set forth each AOC II Respondent's volumetric shares and settlement amounts to be paid in order to participate in the *De Minimis* AOC II. AOC II VRS is attached as Appendix "C-2."
 - e. "AOC III VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC III. The AOC III VRS set forth each AOC III Respondent's volumetric shares and settlement amounts to be paid in order to participate in the AOC III.
 - f. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, et seq.

- g. "Consent Order," "Order," or "AOC III," shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
- h. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
- i. "*De Minimis* PRPs" shall mean all potentially responsible parties identified by EPA for the Site eligible to participate in a *de minimis* settlement, as listed in the AOC I VRS, attached as Appendix "C-1," AOC II VRS, attached as Appendix "C-2," and/or AOC III VRS, attached as Appendix "D."
- j. "DOJ Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that DOJ has paid at or in connection with the Site through May 3, 2003, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- k. "DOJ Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that may be incurred by DOJ in connection with the Site after May 3, 2003, plus Interest on all such costs.
- l. "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- m. "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- n. "EPA Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through June 25, 2002, as documented in the EPA Cost Report dated October 16, 2002, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- o. "EPA Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in

connection with the Site after June 25, 2002, plus Interest on all such costs.

- p. "Hazardous Substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- q. "Interest" shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a).
- r. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, as set forth at 55 Fed. Reg. 8,666 (March 8, 1990), and codified at 40 C.F.R. Part 300, including any amendments thereto.
- s. "Natural Resources" shall have the meaning provided in Section 101(16) of CERCLA, 42 U.S.C. § 9601(16).
- t. "Paragraph" shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter.
- u. "Parties" shall mean EPA and the AOC III Respondents.
- v. "Remedial Costs" shall mean all response costs incurred in implementing the remedial action called for in the Record of Decision ("ROD") dated November 26, 1997, and/or any Explanation for Significant Differences ("ESD") and/or any amendment to that ROD, and/or any new ROD issued in place of that ROD.
- w. "RD/RA Consent Decree" shall mean the Remedial Design/Remedial Action Consent Decree that was entered on December 13, 1999, in connection with the Site in United States v. Action Manufacturing Company, Inc., et. al, Civil Action No. 99-4402.
- x. "RD/RA Consent Decree PRPs" shall mean those Site PRPs that were signatories to the RD/RA Consent Decree.
- y. "Respondents III" or "AOC III Respondents" shall mean those persons, corporations, or other entities listed in Appendix "A," and successors and assigns of such persons, corporations, or other entities, that are signatories to this Consent Order.

- z. "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U.S.C. § 9601(25) incurred with respect to the Malvern TCE Superfund Site.
- aa. "Section" shall mean a portion of this Consent Order identified by a roman numeral.
- bb. "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C.F.R. § 300.400(e), located at and around 258 N. Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B."
- cc. "United States" shall mean the United States of America, including its departments, agencies and instrumentalities.

V. EPA'S STATEMENT OF FACTS

- 4. The Site is located at and around 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B."
- 5. The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemclene Corporation ("Chemclene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 et seq., and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.
- 6. Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including

hazardous substances. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene disposed of wastes, including hazardous substances, at the FDA.

7. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981. Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds.
8. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300, Appendix "B," by publication in the Federal Register. Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983.
9. Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site.
10. Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site. In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No. RCRA-III-010-CA) with EPA. Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order.
11. As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U.S.C. § 9604, and will undertake response actions in the future. Among other things, EPA:
 - a. assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells;
 - b. upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes;

- c. conducted and completed in January 1997 a Remedial Investigation of the Site;
 - d. completed a Feasibility Study of the Site in June 1997; and
 - e. issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site.
12. In performing these response actions, the EPA and DOJ have incurred and will continue to incur response costs. As of June 25, 2002, EPA had incurred \$5,302,459.63 in EPA Past Response Costs. As of May 3, 2003, DOJ had incurred \$359,739.17 in DOJ Past Response Costs. EPA and DOJ may incur, respectively, EPA Future Response Costs and DOJ Future Response Costs at the Site.
13. Commencing in 1996, EPA issued notice letters to approximately 250 Site PRPs, informing those PRPs of their potential liability pursuant to Section 107 of CERCLA, 42 U.S.C. Section 9607, in connection with the Site. Thereafter, EPA entered into the RD/RA Consent Decree with approximately 35 Site PRPs, pursuant to which the RD/RA Consent Decree PRPs agreed, among other things, to perform and fund the remedial action at the Site.
14. EPA also entered into two other Administrative Orders On Consent for *De Minimis* Settlement, AOC I and AOC II, with *De Minimis* PRPs in connection with the Site.
15. In December 2002, a number of RD/RA Consent Decree PRPs filed in the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 02-8964, a contribution action against a number of Site PRPs, including *De Minimis* PRPs that have not entered into any *de minimis* settlements with EPA. EPA has received a number of requests from *de minimis* defendants, including many AOC III Respondents, seeking to settle their alleged CERCLA liability at the Site.
16. EPA has reviewed records describing the transactions of PRPs, including the *De Minimis* PRPs, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each *De Minimis* PRP, including each AOC III Respondent listed in Appendix "A," arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such AOC III Respondent, at the Site, or accepted a hazardous substance for transport to the Site.

17. Information currently known to EPA indicates that each AOC III Respondent listed in Appendix "A," contributed between 1.6 drums and 0.75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each AOC III Respondent to the Site are not significantly more toxic than the other hazardous substances at the Site. The AOC III VRS lists, among other things, the estimated volume of waste contributed to the Site by each AOC III Respondent, and the percentage of waste contributed to the Site by each AOC III Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the AOC III VRS represent EPA's best estimates and are based on all information currently in EPA's possession.
18. EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$21,697,339.80. This amount includes \$5,302,459.63 in EPA Past Response costs, \$ 359,739.17 in DOJ Past Response costs, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00). EPA has received certain information that indicates these estimated remedial costs could be revised.
19. The total payment required to be made by each AOC III Respondent pursuant to this Consent Order is set forth in the AOC III VRS, attached as Appendix "D." The total payment to be made by each AOC III Respondent represents a minor portion of this total response costs incurred and to be incurred at or in connection with the Site, as referenced in Paragraph 18 of this Consent Order.
20. EPA has identified PRPs other than AOC III Respondents, who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

VI. DETERMINATIONS

21. Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that:
 - a. the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

- b. each AOC III Respondent is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
- c. each AOC III Respondent is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g)(1).
- d. the materials shipped to the Site by the AOC III Respondents include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- e. the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- f. the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
- g. prompt settlement with each AOC III Respondent is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- h. as to each AOC III Respondent, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- i. each AOC III Respondent is eligible for a *de minimis* settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A), since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each AOC III Respondent is minimal in comparison to other hazardous substances at the Site.

VII. ORDER

22. Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited *de minimis* settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the AOC III Respondents agree, and EPA hereby Orders, that the AOC III Respondents shall pay their cost share as set forth below:

- a. Within thirty (30) days of the effective date of this Order, each AOC III Respondent shall pay its volumetric share of the cost basis of \$21,697,339.80. This amount includes \$5,302,459.63 in EPA Past Response costs, \$ 359,739.17 in DOJ Past Response costs, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00). The amount to be paid by each settling AOC III Respondent is set forth under the Total Payment Column included in the AOC III VRS, attached as Appendix "D."
- b. The *de minimis* settlement payment required of each AOC III Respondent, as referred to in Paragraph 25.a. of this Order, also includes a settlement premium. This premium is designed to cover risks and uncertainties associated with this settlement, including but not limited to, the risk that total response costs incurred or to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund, or by any private party incurring Remedial Costs, will exceed the estimated total response costs, upon which Respondent's payments are based. However, the premium is not designed to cover the risk that Site Remedial Costs will exceed \$31.2 million, and consequently, the Covenant Not to Sue is subject to the Reservation of Rights in 31.

VIII. PAYMENT

23. Payments by AOC III Respondents shall be made as follows:

- a. Within thirty (30) days of the effective date of this Consent Order, each AOC III Respondent shall pay the amount listed for the AOC III Respondent in the AOC III VRS, attached as Appendix "D " to this Consent Order and as specified in Section VII (Order), above.
- b. Payment may be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

EPA Superfund
U.S. EPA/Region III
Attention: Superfund Accounting

P.O. Box 360515
Pittsburgh, PA 15251-6515

Overnight night deliveries shall be sent to:

Mellon Client Service Center
Room 670
500 Ross Street
Pittsburgh, PA 15262-0001
Attention: EPA, Region III, P.O. Box 360515

Payment also may be made by electronic wire transfer. Each transfer shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

Mellon Bank
Pittsburgh, PA
ABA No. 043000261
credit EPA account number 9108552, lockbox 360515

Customer Service Phone Numbers are as follows:
412/234-4381 (lockbox)
412/234-6200 (wire transfer)

- c. At the time of payment, each AOC III Respondent shall send notice that such payment has been made to:

Charlie Root (3HS21)
Remedial Project Manager
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

24. EPA shall deposit any *de minimis* settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA, or by a party designated by EPA, to conduct or finance response actions at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.

25. Any amounts due and owing by an AOC III Respondent pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue Interest, as defined in Paragraph 3.n. of this Consent Order, which shall be assessed to such AOC III Respondent.

IX. FAILURE TO MAKE PAYMENT

26. If any AOC III Respondent fails to make a payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 30, shall become null and void as to that AOC III Respondent.
27. Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(l) of CERCLA, 42 U.S.C. § 9622(l).

X. CERTIFICATION OF RESPONDENTS

28. By signing this Consent Order, each AOC III Respondent certifies, individually, that, to the best of its knowledge and belief, it has:
- a. conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such AOC III Respondent has no information which would result in a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or the AOC III VRS. For purposes of this provision, a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or AOC III VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the AOC I VRS, AOC II VRS, and/or AOC III VRS changes by more than ten percent (10%). A material change of the information set forth in the AOC I VRS, the AOC II VRS, and/or AOC III VRS also would include any information that results in an increase in the MPA% for any PRP identified in the AOC I VRS, the AOC II VRS, and/or the AOC III VRS to greater than 0.75%;
 - b. not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site; and

- c. fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U.S.C. § 6927.
29. If this certification is subsequently determined to be false, such AOC III Respondent shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such AOC III Respondent's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U.S.C. § 1001.

XI. COVENANT NOT TO SUE BY UNITED STATES

30. In consideration of the payments that will be made by the AOC III Respondents under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the AOC III Respondents for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U.S.C. §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U.S.C. § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each AOC III Respondent upon receipt of that AOC III Respondent's payment as required by Section VIII. With respect to each AOC III Respondent, individually, these covenants are conditioned upon complete performance by such AOC III Respondent of all obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such AOC III Respondent relating to each AOC III Respondent's involvement with the Site. These covenants shall be null and void with respect to any individual AOC III Respondent that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in such AOC III Respondent's Certification under Section X of this Consent Order. These covenants extend only to AOC III Respondents and do not extend to any other person.

XII. RESERVATIONS OF RIGHTS BY UNITED STATES

31. The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the AOC III Respondents for:

- a. any liability as a result of failure to make the payment required by Section VIII (Payment by AOC III Respondents), or otherwise comply with the terms of this Consent Order;
 - b. liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), other than the Site;
 - c. any matters not expressly included in Section XI above (Covenant Not to Sue by the United States);
 - d. liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments;
 - e. liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States;
 - f. criminal liability;
 - g. liability of any AOC III Respondent for violations of federal or state law; or
 - h. any liability for Remedial Costs in excess of \$31.2 million.
32. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any AOC III Respondent, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual AOC III Respondent, if:
- a. such AOC III Respondent contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site;
 - b. such AOC III Respondent fails to make a payment under the terms of this Consent Order; and/or,
 - c. such AOC III Respondent's certification in Section X of this Order is false or materially inaccurate.

XIII. COVENANT NOT TO SUE BY RESPONDENTS

33. AOC III Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to:
- a. Any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;
 - b. any claims arising out of response activities at the Site; and
 - c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, relating to the Site.
34. Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

XIV. EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION

35. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.
36. EPA and the AOC III Respondents agree that the actions undertaken by AOC III Respondents in accordance with this Consent Order do not constitute an admission of any liability by any AOC III Respondent. The AOC III Respondents do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.
37. The AOC III Respondents agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the

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initiation of such suit or claim. The AOC III Respondents also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, AOC III Respondents shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.

38. In any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, recovery of response costs, or other appropriate relief relating to the Site, AOC III Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).
39. Subject to the Reservation of Rights in Section XII of this Order, each AOC III Respondent, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for "matters addressed" in this Consent Order. The "matters addressed" in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States and by private parties, at or in connection with the Site. The "matters addressed" in this settlement do not include those response costs or response actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against AOC III Respondents coming within the scope of such reservations.

XV. OPPORTUNITY FOR PUBLIC COMMENT

40. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973 (d). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

XVI. ATTORNEY GENERAL APPROVAL

41. In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or his designee.

XVII. COSTS AND FEES

42. AOC III Respondents shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto.

XVIII. INTEGRATION/APPENDICES

43. This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order:

"Appendix A" -- List of AOC III Respondents

"Appendix B" -- Map of the Site

"Appendix C-1" -- AOC I VRS

"Appendix C-2" -- AOC II VRS

"Appendix D" -- AOC III VRS

XIX. EFFECTIVE DATE

44. The effective date of this Consent Order shall be the date upon which EPA issues written notice to AOC III Respondents that the public comment period pursuant to Paragraph 40 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

In the Matter of Malvern TCE Superfund Site
Administrative Order on Consent for *De Minimis* Settlement,
U.S. EPA Docket No. CERC-03-2003-0041

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency:

By: _____
Donald S. Welsh
Regional Administrator
Region III

Date

AR000386

THE UNDERSIGNED RESPONDENT enters into this Administrative Order on Consent for *De Minimis* Settlement, U.S. EPA Docket No. CERC-03-2003-0041, relating to the Malvern TCE Superfund Site, 258 N. Phoenixville Pike, Malvern, Pennsylvania.

FOR RESPONDENT: _____
[Name]

[Address]

By: _____
[Signature] [Date]

[Type name and Title]

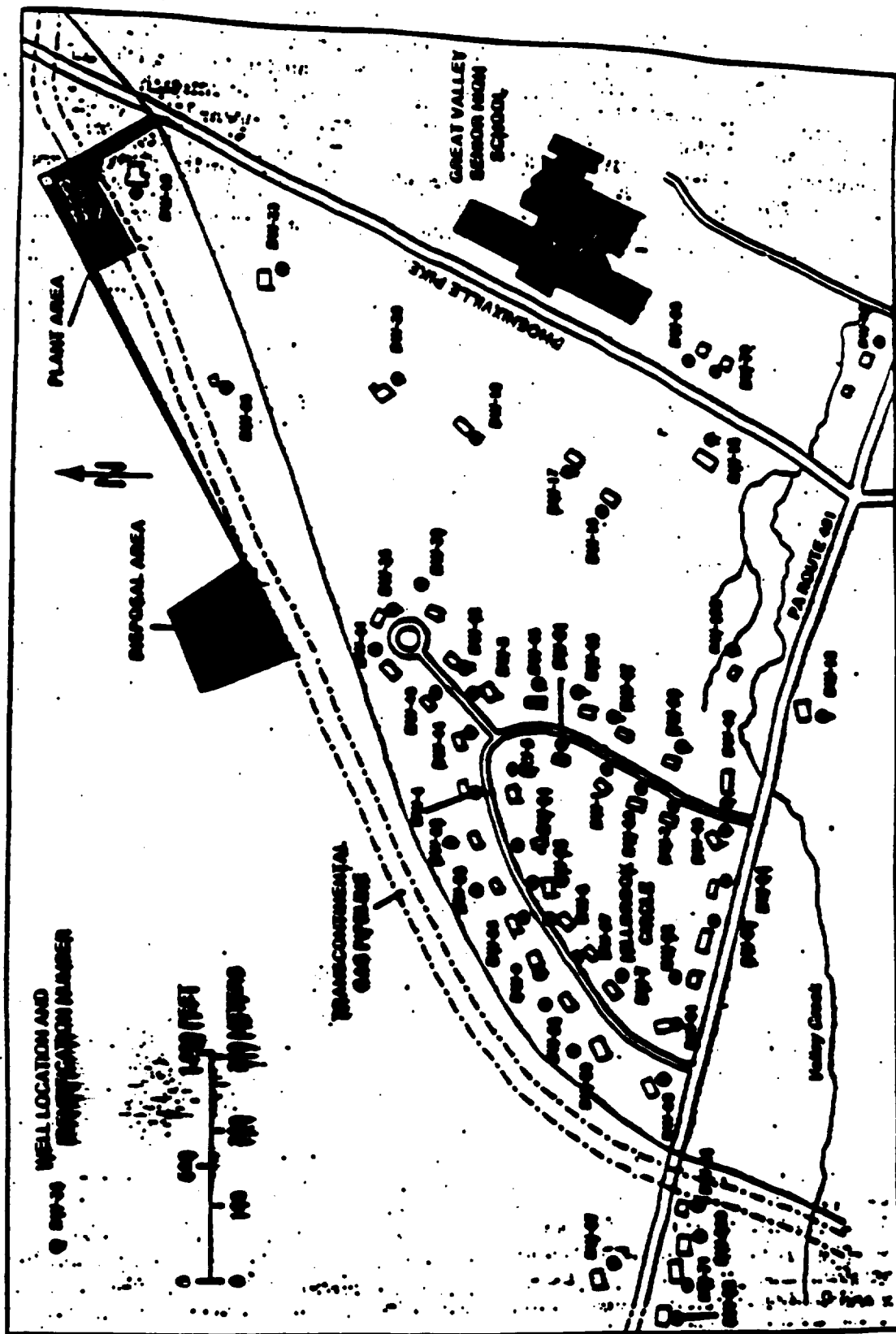
Appendix A
List of AOC III PRPs/Settlors

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Appendix B

Site Map

AR000389



HALVERN TCE SITE MAP

Appendix C-1
AOC I VRS

AR000391

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

Malvern TCE Refund Site
Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duis Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000393

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,108	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

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Malvern TCE Superfund Site
Generator Volume Ranking Summary*
 (By Alphabetical Listing)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						401.00	1.46%	1.60%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Beryco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,879	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000395

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.98	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000396

Malvern TCE Superfund Site
Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. I. T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Elisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Ervin's Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext - Corporal						4.00	0.01%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000397

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Glitech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volur ankng Summary.

D De minimis party

AR000398

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.08	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc.						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000399

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc /Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000400

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000401

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						18.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutt/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Pettler Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Voluming Summary

D De micromis party

AR000402

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000403

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sarivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000404

Malvern TCE Refund Site
Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						28.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						728.00	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						8.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000405

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
USG Grouping						688.48	2.12%	2.20%			A
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Witronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000406

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
De Minimis Total:	673.00	25.09%	23.48%	\$2,158,627	\$950,287	884.37	35.69%	33.51%	\$2,796,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			2768.87	100.00%	100.00%			

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000407

Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Welch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.30%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co						522.70	1.89%	1.96%			A
Burroughs Corp	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co						495.00	1.79%	1.85%			A
Resource Technology Services, Inc						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reddy Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
NW Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

* Superceding 4/27/98 VRS

- A De minimis party and does not qualify for de minimis settlement offer
- B Party has been identified as an orphan
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D If a company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary
- E De minimis party

AR000409

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Ayden						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc.						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawachi Berylo						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Levell Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000410

11/30/98

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						187.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylco						143.00	0.52%	0.54%			D, A
Stein Seal Co						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co	60.00	2.83%	2.88%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimus settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout alphabetical Volumetric Ranking Summary

E De minimus party

AR000411

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112 00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110 00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104 00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103 80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97 00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95 00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94 04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87 00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86 00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co	21 00	0.92%	0.94%	\$87,008	\$38,303	86 00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobart Associates						85 15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84 64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83 00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34 00	1.49%	1.52%	\$140,870	\$62,015	82 00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81 00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc						79 00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co						74 00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74 00	0.27%	0.28%			D, A
Moore Products	73 00	3.20%	3.27%	\$302,456	\$133,150	73 00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72 41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
USG Grouping											
Floor Systems Inc.						71 40	0.26%	0.27%			D, A

* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR0000412

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welox Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mda Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc / Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities through the alphabetical Volumetric Ranking Summary

E De minimis party

AR000413

Malvern TCE rfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc /Magnafix						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Devey Products						41.00	0.15%	0.15%			D, A
Adelpha Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp	8.00	0.35%	0.36%	\$33,146	\$14,582	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Alteler Mfg						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000414

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Sold State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

AR000415

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amunel Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendiru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Candei Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Dellron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kuticke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Evide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sekens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superseding 4/27/98 VRS

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B Party has been identified as an orphan

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D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000416

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C K Systematics, Inc						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penrwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

* Superceding 4/27/98 VRS

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D If company appears under a grouping, please refer to the combined entities throughout alphabetical Volumetric Ranking Summary

E De minimis party

AR000417

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

* Superseding 4/27/98 VRS

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR0000418

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Elitco						8.38	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Defense Reutilization & Marketing Grouping											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V D A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem. & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.00	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E L rms party

AR000419

Malvern TCE verfund Site
Generator Volumet. Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovetun Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Phico Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tate Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.98	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyerlown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervin Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superseding 4/27/98 VRS

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E De micromis party

AR000420

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext. Corporal						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,298	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

* Superceding 4/27/98 VRS

A De minimus party and does not qualify for de minimus settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimus party

AR000421

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permut/Sybron Corp						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000422

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Duse Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

AR000423

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Wiltronics						0.30	0.00%	0.00%			E
Lightman Drum Co						0.27	0.00%	0.00%			C
Meck Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
De Minimis Total:	673.68	25.00%	23.48%	\$2,168,627	\$868,287	8864.37	35.68%	33.61%	\$2,796,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			27688.87	100.00%	100.00%			

* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000424

Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

Malvern TCI erfund Site
Broker/Transporter Volumetric Ranking Summary*

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310
Eldredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,810	\$22,420	\$126	\$22,546
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						208.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.38	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
Total:	72.00	3.16%	3.22%	\$82,865	\$36,479	2689.36	9.38%	9.62%	\$194,861	\$86,001	\$399,862	\$258,082	\$656,291

AR000426

* Superseding 4/27/98 VRS

A Party does not qualify for *de minimis* settlement offer

B Party has been identified as an orphan

Appendix C-2
AOC II VRS

Malvern TCE Superfund Site
Explanation Sheet for the Second Round De Minimis Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round De Minimis Settlement. This New VRS for the Second Round De Minimis Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round De Minimis Settlement.¹

PRP Name = The name of the specific potentially responsible party (PRP).

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

MPA Drums = The total number of drums sent by each PRP, regardless of the date.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

Total Payment = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

³ The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site
Second Round De Minimis Settlement
Volumetric Ranking Summary
(Alphabetical by PRP)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boebel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Ervins Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
Total	71					432.98					\$716,177

AR000429

Appendix D
AOC III VRS

AR000430

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemcene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemcene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporation (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
3rd Round De Minimis Total													
Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

AR000434

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporation (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

Malvern TCE Superfund Site

08/07/2003

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
3rd Round De Minimis Total Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

AR0000438

Enclosure D
Administrative Order of Consent III
Volumetric Ranking Summary

AR000439

Malvern TCE Superfund Site
Explanation Sheet for the Third Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round *De Minimis* Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemcene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemcene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporaton (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

AR000442

Malvern TCE Superfund Site

08/07/2003

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
R C Kietzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
Technitrol*						10.00	0.04	0.04	\$4,063	\$3,521			\$7,584
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$12,740			\$20,906
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842

Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$92,363			\$151,566
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
3rd Round De Minimis Total Number of Drums	120.00					1909.02							\$3,494,932
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

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Malvern TCE Superfund Site
Explanation Sheet for the Third Round De Minimis Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round De Minimis Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS").¹

PRP Name = The name of the specific potentially responsible party ("PRP").

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemcene prior to August 1, 1975 (2,283.71 FDA drums), multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² FDA drums received by Chemcene Corporation prior to August 1, 1975 (2,200.69 FDA drums), multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818.90 (the total past costs³ and estimated future cost associated with the FDA).

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739.00)

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. Full numbers are used in the calculation of the DeMinimis Payment.

² Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties. The total orphan and non-settling de micromis drums used for this settlement are 83.02 FDA drums and 1,622.82 MPA drums.

³ For purposes of this settlement, the total past costs for the Site is \$6,474,159.80 (\$5,302,459.63 in EPA Past Costs through June 26, 2002; \$359,739.17 in DOJ Past Costs through May 3, 2003; and \$811,961.00 in waterline costs incurred by the RD/RA Consent Decree PRPs). One-half of the Past Costs total, \$3,237,079.90, has been allocated to the FDA; the other half has been allocated to the MPA.

multiplied by the applicable premium (125% or 225%).

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date.

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporaton (27,608.87 drums), multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan² drums received by Chemclene Corporation (25,986.05 drums), multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520.90, the total Past Cost³ and Estimated Future Costs associated with th MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%).

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP.

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP.

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Malvern TCE Superfund Site

05/25/2004

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Accuracy Scientific Instruments*	3.00	0.13	0.14	\$15,186	\$13,466	34.18	0.12	0.13	\$13,887	\$12,036			\$54,575
Airline Hydraulics Corporation						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Allister Manufacturing						36.00	0.13	0.14	\$14,626	\$22,818			\$37,444
Ametek, Inc.	9.00	0.39	0.41	\$45,558	\$72,718	42.18	0.15	0.16	\$17,137	\$26,735			\$162,148
Amp	34.00	1.49	1.54	\$172,107	\$274,714	133.00	0.48	0.51	\$54,035	\$84,301			\$585,156
Ark Products	5.00	0.22	0.23	\$25,310	\$40,399	52.00	0.19	0.20	\$21,126	\$32,960			\$119,795
Athena Controls						42.00	0.15	0.16	\$17,064	\$26,621			\$43,685
Bishop Tube	60.00	2.63	2.73	\$303,718	\$484,789	130.00	0.47	0.50	\$52,816	\$82,399			\$923,722
CK Systematics, Inc.						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Camdel Metals						21.00	0.08	0.08	\$8,532	\$13,311			\$21,842
Carvel Hall, Inc.						37.00	0.13	0.14	\$15,032	\$23,452			\$38,484
Chem Solv						2.00	0.01	0.01	\$813	\$1,268			\$2,080
Contamination Control						20.00	0.07	0.08	\$8,126	\$12,677			\$20,802
David K. Robson, Inc.						18.00	0.07	0.07	\$7,313	\$11,409			\$18,722
E. Hopkins Company						4.00	0.01	0.02	\$1,625	\$2,535			\$4,160
Emeco	3.00	0.13	0.14	\$15,186	\$24,239	3.00	0.01	0.01	\$1,219	\$1,902			\$42,546
Fabric Development						13.00	0.05	0.05	\$5,282	\$8,240			\$13,522
Fairfax Cleaners						8.00	0.03	0.03	\$3,250	\$5,071			\$8,321
Fergusson						5.96	0.02	0.02	\$2,421	\$3,778			\$6,199
Frazer-Volpe Corporation						23.82	0.09	0.09	\$9,678	\$15,098			\$24,776
FTC Hazardous (Broker)						89.91	0.33	0.35	\$36,528	\$56,989	\$93,517		\$93,517
G. K. Garrett Corporation						27.45	0.10	0.11	\$11,152	\$17,399			\$28,551
Glah Brothers, Inc.*						3.00	0.01	0.01	\$1,219	\$1,056			\$2,275
Gulf & Western						2.00	0.01	0.01	\$813	\$1,268			\$2,080
High Energy Company						84.64	0.31	0.33	\$34,387	\$53,648			\$88,035
Hulltronics						2.00	0.01	0.01	\$813	\$1,268			\$2,080
J & J Spill (Brokered Drums)**						115.54	0.42	0.44	\$46,941	\$73,234	\$120,175		\$120,175
J & J Spill (Generator Drums)**						43.00	0.16	0.17	\$17,470	\$27,255		\$44,725	\$44,725
Keystone Transformer*						4.00	0.01	0.02	\$1,625	\$1,409			\$3,034
Kosempel Manufacturing Co.*						13.00	0.05	0.05	\$5,282	\$4,578			\$9,859
Leeds & Northrop						145.72	0.53	0.56	\$59,203	\$51,313			\$110,515
Lightman Drum Co. (Brokered Drums)***						48.00	0.17	0.18	\$19,501	\$30,424	\$49,926		\$49,926
Lightman Drum Co. (Generator Drums)***						0.27	0.00	0.00	\$110	\$171		\$281	\$281
Malco Inc.						94.04	0.34	0.36	\$38,206	\$59,606			\$97,813

Third Round De Minimis Settlement

Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Matheson Instrument						20.10	0.07	0.08	\$8,166	\$7,078			\$15,244
McClarin Plastics						195.04	0.71	0.75	\$79,240	\$123,624			\$202,864
Model Finishing						25.00	0.09	0.10	\$10,157	\$15,846			\$26,003
Narco Avionics						19.00	0.07	0.07	\$7,719	\$12,043			\$19,762
National Metalcrafters						16.00	0.06	0.06	\$6,500	\$10,141			\$16,642
Ni-Chro						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Oxford Metal Products						17.00	0.06	0.07	\$6,907	\$10,775			\$17,682
Penn Airborne Products						15.31	0.06	0.06	\$6,220	\$9,704			\$15,924
Penske VDA*						8.00	0.03	0.03	\$3,250	\$2,817			\$6,067
Philadelphia Steel Drum (Brokered Drums)						43.00	0.16	0.17	\$17,470	\$27,255	\$44,725		\$44,725
Philco Ford*	6.00	0.26	0.27	\$30,372	\$26,933	6.00	0.02	0.02	\$2,438	\$2,113			\$61,855
Precision Arts Mfg.						3.00	0.01	0.01	\$1,219	\$1,902			\$3,120
Princo Instruments, Inc.						79.00	0.29	0.30	\$32,096	\$50,073			\$82,169
Prodelin, Inc.						9.00	0.03	0.03	\$3,656	\$5,705			\$9,361
R C Kletzing						2.50	0.01	0.01	\$1,016	\$1,585			\$2,600
Sermetal*						6.00	0.02	0.02	\$2,438	\$2,113			\$4,550
Shur-Kut Supply Corp						7.00	0.03	0.03	\$2,844	\$4,437			\$7,281
Solid State Scientific*						32.00	0.12	0.12	\$13,001	\$11,268			\$24,269
Storm Weather Products						26.00	0.09	0.10	\$10,563	\$16,480			\$27,043
U.S. Environmental Services (Brokered Drums)*						4.00	0.01	0.02	\$1,625	\$1,409	\$3,034		\$3,034
Waste Consulting & Brokerage (Brokered Drums)*						5.36	0.02	0.02	\$2,178	\$1,887	\$4,065		\$4,065
Xynatech, Inc.						39.00	0.14	0.15	\$15,845	\$24,720			\$40,565
3rd Round De Minimis Total Number of Drums	120.00					1899.02							\$3,440,635
Site Total Number of Drums	2283.71					27608.87							

* Indicates 125% Premium is applied. All other parties receive 225% Premium.

**J & J Spill Total Payment = \$164,928

***Lightman Drum Total Payment = \$50,247

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Enclosure E
Volumetric Ranking Summaries
Overview & Methodology

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Malvern TCE Volumetric Ranking Summaries/Overview and Methodology

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

A. Generator and Transporter Volumetric Ranking Summaries

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemcene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

B. Information contained in Summaries

In general, the attached Summaries provide the following for each PRP:

1. The volume of waste each PRP contributed to the Site.

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemcene as part of its operations. These amounts are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

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relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. De minimis settlement payment required of each settling de minimis PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

II. METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES

A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

B. Interpretation of Documents

1. Waste into the Site

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transhipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.

- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. See 40 C.F.R. § 261.7.

D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

III. *DE MINIMIS* SETTLEMENT

A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is

determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

Enclosure F
Comprehensive Mailing List of All Site PRPs

AR000458

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c/o Syntex Dental Corp.
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ALCOA

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AR000460

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AR000461

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AR000462

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AR000463

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Bilgram Gear Company

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Cabot Company

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Carvel Hall, Inc.

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Dixon Industries Corporation

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AR000471

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**** Petrocon**

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AR000489

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AR000490

Malvern TCE Comprehensive Mailing List

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AR000492

Malvern TCE Comprehensive Mailing List

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AR000498

Malvern TCE Comprehensive Mailing List

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AR000500

Malvern TCE Comprehensive Mailing List

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AR000501

Malvern TCE Comprehensive Mailing List

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AR000502

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Accuracy Scientific

6/12/75	3783	NA	NA	CARBON	3.00	Yes
5/28/76	9381	NA	NA	CHLOROTHENE	4.00	Yes
6/21/77	3526	NA	NA	DIRTY 1,1,1 TRICHLOROETHANE	4.00	Yes
5/11/78	3641	NA	NA	1,1,1 TRICHLOROETHANE	3.00	Yes
10/17/78	4786	NA	NA	1,1,1 TRICHLOROETHANE	4.00	Yes
4/15/80	NA	7982	NA	1,1,1 TRICHLOROETHANE	4.00	Yes
3/2/83	568	NA	PAA4766156	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
4/10/86	0		PAB 00892511	TRICHLOROETHANE	3.00	Yes
3/20/87	2052	14226	PAB 3050596	OIL	3.00	Yes
3/31/87	5052	14251	PAB 4769623	WASTE 1,1,1 TRICHLOROETHANE, NEW KER	3.18	Yes
4/29/87	2010	14296	NA	UNUSED KEROSENE	1.00	Yes
Total Waste Counted Towards Ranking					34.18	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Airline Hydraulic Corporation

7/10/91	3565	17045	PAC 2938795	WASTE PETROLEUM NAPTHA	2.00	Yes
5/26/92	3807	17527	PAC 6119864	WASTE PETROLEUM NAPTHA	2.00	Yes
Total Waste Counted Towards Ranking					4.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date: 6/15/00****PRP Name:** Allister Mfg.

Transaction Date	Order Number	Quantity	Product	Description	Weight (lbs)	Count
7/28/86	1812	NA	PAB 2331980	WASTE 1,1,1 TRICHLOROETHANE	12.00	Yes
3/25/87	2059	NA	PAB 3232316	WASTE 1,1,1 TRICHLOROETHANE	5.00	Yes
12/29/87	2360	14768	PAB 5071054	WASTE 1,1,1 TRICHLOROETHANE	6.00	Yes
8/31/88	2594	15197	PAB 5624626	WASTE 1,1,1 TRICHLOROETHANE	4.00	Yes
7/21/89	2975	15767	PAB 1194126	WASTE 1,1,1 TRICHLOROETHANE	5.00	Yes
7/21/89	2975	15767	PAB1194126	WASTE 1,1,1 TRICHLOROETHANE & WATER	1.00	Yes
3/19/90	3223	16233	PAC 1787100	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
Total Waste Counted Towards Ranking					36.00	

AR000505

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Ametek, Inc.

1/14/75	3561	NA	PAB 00893491	DIRTY TRI	3.00	Yes
3/26/75	3596	NA	NA	TRI	4.00	Yes
7/14/75	3794	NA	NA	DIRTY TRI	2.00	Yes
1/16/86	1531	13431	PAB 00893034	TRICHLORETHYLENE	7.00	Yes
1/16/86	1532	13431	PAB 00893034	WASTE 1,1,1 TRICHLOROETHANE	0.18	Yes
1/16/86	1533	13431	PAB 00893034	WASTE PERCHLORETHYLENE	0.09	No
1/16/86	1531	13431	PAB00893034	TRICHLOROETHYLENE & TOLUENE	10.00	Yes
1/20/86			PAB00893491	METHYLENE CHLORIDE AND ETHANOL	1.00	Yes
1/20/86			PAB00893491	TRICHLORETHYLENE AND PAINT	4.00	Yes
2/19/86	4675	13503	PAB 00893491	RECLAIMED TRICHLOROETHYLENE & PAINT	4.00	Yes
2/19/86	4675	13503	PAB00893491	RECLAIMED TRICHLORETHYLENE	3.00	No
2/20/86	1598	13504	PAB 00893491	WASTE METHYLENE CHLORIDE AND METH	1.00	Yes
3/14/86	1597	13548	PAB 00893991	WASTE TRICHLORETHYLENE	6.00	Yes
3/14/86	4703	13548	PAB 00893991	VIRGIN TRICHLOROETHYLENE	22.26	No
3/14/86	4702	13548	PAB 00893991	RECLAIMED TRICHLORETHYLENE	5.43	No
Total Waste Counted Towards Ranking					42.18	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Amp Corp.

10/9/73	899	NA	NA	SPENT CHLORINATED SOLVENT	14.00	Yes
7/29/75	3799	NA	NA	SPENT CHLORINATED SOLVENT	20.00	Yes
3/10/81	NA	NA	PAA 0128892	PERCHLORETHYLENE	24.00	Yes
5/6/81	145	8567	NA	DIRTY PERCHLORETHYLENE	24.00	Yes
10/20/81	288	NA	PAA 1094354	PERCHLORETHYLENE	25.00	Yes
11/11/81	3032	10055	NA	RECLAIMED PERCHLORETHYLENE	17.18	No
1/22/82	NA	NA	PAA 1094542	WASTE PERCHLORETHYLENE	26.00	Yes
3/8/82	3137	10289	NA	RECLAIMED PERCHLORETHYLENE	29.41	No
Total Waste Counted Towards Ranking					133.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date: 6/15/00****PRP Name: Ark Products**

Transaction Date	Order Number	Quantity	Material	Description	Volume (Gallons)	Counted Towards Ranking
2/20/75	3578	5526	NA	SCRAP OIL	5.00	Yes
1/6/76	3832	NA	NA	WASTE OIL	6.00	Yes
3/31/77	9496	6572	NA	WASTE OIL	6.00	Yes
10/27/77	4887	6837	NA	WASTE OIL	6.00	Yes
6/20/78	4738	7131	NA	WASTE OIL	6.00	Yes
10/4/78	4783	7265	NA	WASTE OIL	5.00	Yes
2/2/79	4841	7424	NA	WASTE OIL	6.00	Yes
5/25/79	9995	7544	NA	WASTE OIL	6.00	Yes
2/4/80	9689	7864	NA	WASTE NON- SOLVENT	6.00	Yes
Total Waste Counted Towards Ranking					52.00	

AR000508

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Athena Controls

7/6/83	672		PAA 4767232	TRICHLOROETHANE	7.00	Yes
11/17/83	744		PAA 4767991	CHLORINATED SOLVENT	4.00	Yes
2/1/84	856		PAA 4768971	FREON MIXTURE	4.00	Yes
9/11/89	3017		PAD 1280086	JUNK DRUM	1.00	No
9/11/89	3017		PAD 1280086	WAVE OIL	2.00	Yes
9/11/89	3017		PAC 1280086	ISOPROPANOL, FREON AND WASTE 1,1,1 TR	1.00	Yes
12/1/89	3117		PAC 1280716	DENATURED ALCOHOL	1.00	Yes
4/17/90	3244		PAC 1670745	DENATURED ALCOHOL	1.00	Yes
6/12/90	3294		PAC 1671014	DENATURED ALCOHOL	1.00	Yes
7/9/90	3319		PAC 1671202	ALCOHOL	1.00	Yes
8/22/90	3361		PAC 2937292	DENATURED ALCOHOL	1.00	Yes
11/5/90	3407		PAC 2937616	ETHYL ALCOHOL	1.00	Yes
1/30/91	3470		PAC 2938003	ETHYL ALCOHOL	2.00	Yes
3/6/91	3494		PAC 2938180	DENATURED ALCOHOL	1.00	Yes
4/11/91	3515		PAC 2938390	DENATURED ALCOHOL	1.00	Yes
5/10/91	3532		PAC 2938493	ALCOHOL	1.00	Yes
6/24/91	3559		PAC 2938736	DENATURED ALCOHOL	1.00	Yes
8/5/91	3591		PAC 2938972	ALCOHOL	1.00	Yes
9/12/91	3621		PAC 4868474	ALCOHOL	1.00	Yes
10/29/91	3647		PAC 4868673	ALCOHOL	1.00	Yes
12/3/91	3673		PAC 4868846	DENATURED ALCOHOL	1.00	Yes
12/3/91	3673		PAC 4868846	RCRA EMPTY DRUMS	3.00	No
1/14/92	3694		PAC 4869060	DENATURED ALCOHOL	1.00	Yes
2/27/92	3737		PAC 1789760	DENATURED ALCOHOL	1.00	Yes
3/30/92	3764		PAC 1790003	DENATURED ALCOHOL	1.00	Yes
3/30/92	3764		PAC 1790003	EMPTY DRUMS	2.00	No
5/6/92	3801		PAC 6119783	DENATURED ALCOHOL	1.00	Yes
6/11/92	3822		PAC 6119912	DENATURED ALCOHOL	1.00	Yes
6/11/92	3822		PAC 6119912	EMPTY USED DRUMS	2.00	Yes
7/15/92	3845		PAC 6120052	DENATURED ALCOHOL	1.00	Yes
Total Waste Counted Towards Ranking					42.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Bishop Tube Co.

Inv. Date	Order Number	Quantity	Material	Waste Description	Volume	Conf.
2/11/75	3573	NA	NA	DIRTY TRI	9.00	Yes
3/24/75	3592	NA	NA	DIRTY TRI	7.00	Yes
4/15/75	3753	NA	NA	DIRTY TRI	44.00	Yes
8/17/78	4761	NA	NA	WATER	8.00	Yes
8/17/78	4761	NA	NA	TRICHLORETHYLENE	10.00	Yes
8/28/78	4727	NA	NA	TRICHLORETHYLENE	12.00	Yes
8/28/78	NA	7217	NA	TRICHLORETHYLENE	47.18	No
1/27/79	4797	NA	NA	DIRTY TRICHLORETHYLENE	11.00	Yes
1/27/79	4828	NA	NA	DIRTY TRICHLORETHYLENE	29.00	Yes
Total Waste Counted Towards Ranking					130.00	

AR000510

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: C. K. Systematics, Inc.

7/12/83	675	11395	PAA 4766775	WASTE LACQUER THINNER	6.00	Yes
6/27/84	1020	12212	PAA 2559362	FLAMMABLES	2.00	Yes
6/27/84	1019	12212	PAA 2559362	WASTE TRICHLORETHYLENE	2.00	Yes
2/26/85	1646	13520	PAB 2262772	WASTE TRICHLORETHYLENE	1.00	Yes
2/26/85	1645	13520	PAB 2262772	WASTE HYDRAULIC OIL	1.00	Yes
2/26/85	1647	13520	PAB 2262772	WASTE COMPOUND THINNING LIQUID	2.00	Yes
3/5/85	1264	12771	PAB 00890444	WASTE LUBRICATING OIL	1.00	Yes
3/5/85	1262	12771	PAB 00890444	WASTE COMPOUND THINNING LIQUID	1.00	Yes
3/5/85	1263	12771	PAB 00890444	WASTE TRICHLORETHYLENE	1.00	Yes
4/19/85	1321	12866	PAB 00891170	WASTE CHROMIC ACID, SULFURIC ACID	1.64	No
4/19/85	1322	12866	PAB 00891170	NON HAZARDOUS WASTE WATER SOLUBLI	1.00	No
2/6/91	3475	16831	NJA 1032155	WASTE WATER, SULFURIC ACID, & CHROM	1.64	No
Total Waste Counted Towards Ranking					17.00	

AR000511

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Camdel Metals

4/3/81	165	NA	PAA 0128995	TRICHLOROETHANE	7.00	Yes
4/30/81		NA	PAA 0129080	TRICHLOROETHANE	7.00	Yes
4/30/81	163	8533	NA	1,1,1 TRICHLOROETHANE	7.00	No
4/30/81	180	NA	NA	WASTE 1,1,1 TRICHLOROETHANE	7.00	Yes
Total Waste Counted Towards Ranking					21.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Carvel Hall Inc

6/24/85	1379	13013	PAB00891601	RECLAIMED PERCHLORETHYLENE	37.00	Yes
Total Waste Counted Towards Ranking					37.00	

AR000513

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Chem-Solv

Inv ID	Order Number					
11/30/83	797	11734	PAA 3593715	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/30/83	796	11734	PAA 3593715	WASTE METHYLENE CHLORIDE, H2O	1.00	Yes
Total Waste Counted Towards Ranking					2.00	

AR000514

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Contamination Control, Inc.

Transaction Date	Order Number	Invoice Number	Material Description	Quantity	Ranking
11/27/85	1556	13338	PAB 01171715 WASTE METHYLENE CHLORIDE	12.00	Yes
5/29/86	1752	13706	PAB 2166846 WASTE METHYLENE CHLORIDE & PAINT	8.00	Yes
Total Waste Counted Towards Ranking				20.00	

AR000515

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date: 6/15/00****PRP Name: David K. Robson, Inc.**

8/29/86	1843	13872	PAB 2262363	WASTE PAINT, HEPTANE, ACETONE, LAQUE	6.00	Yes
9/8/87	2225	14554	PAB 4770920	WASTE PAINT, HEPTANE, ACETONE, LAQUE	4.00	Yes
11/9/87	2293	14672	PAB 4771502	WASTE PAINT, HEPTANE, ACETONE, LAQUE	2.00	Yes
1/12/88	2377	14799	NJA 0388132	WASTE CALCIUM CHLORIDE, SODIUM DICH	1.00	No
1/12/88	2375	14799	NJA 0388132	WASTE CHROMIC ACID, OIL DRY, & WATER	1.00	No
1/12/88	2374	14799	NJA 0388132	WASTE ALODINE (CHROMIUM)	2.00	No
1/12/88	2376	14799	NJA 0388132	WASTE NITRIC ACID SOLUTION	1.00	No
12/13/89	3124	16072	NJA 0391204	WASTE WATER AND CHROMIC ACID	1.00	No
12/13/89	3125	16072	NJA 0391204	WASTE WATER & SODIUM FLUOROBORAT	1.00	No
6/9/92	3817	17550	PAC 6119901	WASTE FLAMMABLES (THINNER)	6.00	Yes
6/9/92	3816	17550	NJA 0960098	WASTE CORROSIVE LIQUID	1.00	No
6/9/92	3815	17550	NJA 0960098	WASTE CORROSIVE SOLIDS	2.00	No
Total Waste Counted Towards Ranking					18.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: E. Hopkins Co.

9/7/90	3369	16577	PAC 2937384	WASTE MINERAL SPIRITS, OIL & GREASE	4.00	Yes
Total Waste Counted Towards Ranking					4.00	

AR000517

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Emeco

1/6/75	3555	NA	NA	EMPTY DRUMS	16.00	No
1/6/75	3555	NA	NA	DIRTY TRI	3.00	Yes
Total Waste Counted Towards Ranking					3.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Fabric Development

4/4/84	908	12009	PAA 4768713	HAZARDOUS WASTE, LIQUID. NOS.	2.00	Yes
4/16/90	6910	16285	NA	TRICHTHORETHYLENE	1.00	Yes
4/16/90	6910	16285	NA	METHYLENE CHLORIDE	6.00	Yes
7/20/90	3332	16483	PAC 2937056	WASTE METHYLENE CHLORIDE/TRICHTHORE	4.00	Yes
Total Waste Counted Towards Ranking					13.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Fairfax Cleaners

Event Date	Order Number	Location	Material	Waste Description	Quantity	Is Waste
9/17/76	9423	NA	NA	PERCHLORETHYLENE	4.00	Yes
9/28/76	9429	NA	NA	PERCHLORETHYLENE	4.00	Yes
Total Waste Counted Towards Ranking					8.00	

AR000520

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Fergusson

10/8/75	3893	NA	NA	UNSPECIFIED	5.96	Yes
Total Waste Counted Towards Ranking					5.96	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Frazer-Volpe Corporation

1/14/83	541	10986	PAA4765321	TRICHTHORETHYLENE	0.18	Yes
4/3/84	906	12006	PAA 4768702	WASTE MIXED FLAMMABLE LIQUID	0.64	Yes
5/21/84	965	12120	PAA 4769973	WASTE METHYLENE CHLORIDE	0.27	Yes
5/21/84	4003	12117	NA	LRA 1014 DEMO - NC	1.00	No
5/21/84	4003	12117	NA	M-CLENE D	0.18	No
8/24/84	1967	12349	PAA 2559745	WASTE FLAMMABLE LIQUID NOS (ACETON	0.73	Yes
7/10/85	1410	13049	PAB 00891940	WASTE FLAMMABLE LIQUID (ACETONE, M	0.45	Yes
9/3/86	1845	13876	PAB 2262411	WASTE ACETONE, METHYLENE CHLORIDE,	1.00	Yes
2/3/87	4996	14139	NA	WASTE METHYLENE CHLORIDE	0.18	No
3/26/87	2064	14238	PAB 4769542	WASTE METHYLENE CHLORIDE	0.27	Yes
3/26/87	2064	14238	PAB 4769542	WASTE FLAMMABLES	0.90	Yes
6/12/87	2149	14399	PAB 4770312	WASTE ALCOHOL, PAINT THINNER, XYLENI	1.09	Yes
7/2/87	5145	14429	NA	M CLEAN D	0.18	No
8/14/87	5184	14517	NA	M CLEAN D	0.18	No
9/17/87	2238	14578	PAB 4771060	WASTE ISOPROPOL, PAINT THINNER, XYLEN	1.18	Yes
9/17/87	2238	14578	PAB 4771060	SOLIDS	0.09	Yes
3/3/88	2415	14891	PAB 5249532	WASTE MIXED SOLVENTS	1.64	Yes
3/3/88	2415	14891	PAB 5249532	SOLIDS	0.09	Yes
11/10/88	2684	15322	PAB 5911555	WASTE FLAMMABLE LIQUID MIXED WITH C	5.00	Yes
3/2/89	2805	15499	PAB 5912211	WASTE IOSPROPANOL,TOULENE, MA, MC, I	3.00	Yes
10/19/89	3066	15965	PAC 1280462	PROPANOL, ACETONE, MC, TCA	3.00	Yes
10/19/89	3066	15965	PAC 1280462	SOLIDS	0.29	Yes
7/3/90	3314	16450	PAC 1671165	WASTE MIXED FLAMMABLE LIQUID	2.00	Yes
4/14/92	3784	17467	PAC 6119654	WASTE ACETONE, NUTHANOL, ISOPROPAN	2.00	Yes
Total Waste Counted Towards Ranking					23.82	

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: F T C Hazardous

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Quantity	Counted Toward Ranking	Generator Name
5/18/81	NA	8591	NA	WASTE 1,1,1 TRICHLOROETHANE	23.00	Yes	Chem Par
9/3/81	NA	8791	PAA 1106136	WASTE 1,1,1 TRICHLOROETHANE	7.00	Yes	Chem Par
9/3/81	NA	8791	PAA 1106136	WASTE TRICHLOROETHYLENE	1.00	Yes	Chem Par
9/17/81	NA	8813	NA	WASTE 1,1,1 TRICHLOROETHANE	8.00	Yes	Chem Par
2/23/82	353	10260	NA	WASTE TRICHLOROETHYLENE	1.00	Yes	Hulltronics
8/4/82	451	10630	PAA 1106626	WASTE 1,1,1 TRICHLOROETHANE	29.00	Yes	Decision Data
9/16/82	467	10727	NA	1-1-1	2.00	Yes	Decision Data
9/16/82	467	10727	NA	MIXED SOLVENT	1.00	Yes	Hulltronics
9/16/82	467	10727	NA	SLUDGE	1.00	Yes	Devon Apparel
9/16/82	467	10727	PAA 1106991	PERCHLORETHYLENE	1.00	Yes	Lowry's
11/17/82	515	10876	PAA 1107400	WASTE 1,1,1 TRICHLOROETHANE	1.09	Yes	Ellisco
1/27/83	552	11014	NA	WASTE 1,1,1 TRICHLOROETHANE	5.00	Yes	Decision Data
3/22/83	583	11125	PAA 1107724	WASTE 1,1,1 TRICHLOROETHANE	1.18	Yes	Ellisco
4/28/83	611	11219	PAA 1108004	PERCHLORETHYLENE	0.55	Yes	Lowry's
6/2/83	643	11293	PAA 2702210	WASTE FREON MIXTURE	1.00	Yes	Sperry Univac
6/30/83	670	11355	PAA 2702302	WASTE 1,1,1 TRICHLOROETHANE	0.82	Yes	Ellisco
8/17/83	701	11470	PAA 2701952	WASTE FREON MIXTURE	1.00	Yes	Sperry Univac
10/5/83	735	22585	PAA 2702593	WASTE PICKLE LIQUEUR	2.00	Yes	Eaton
11/4/83	772	11664	PAA 2701699	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes	Ellisco
6/12/84	992	12176	PAA 4961902	PERCHLORETHYLENE	1.00	Yes	Lowry's
7/10/84	1025	12233	PAA 4962565	WASTE 1,1,1 TRICHLOROETHANE	1.27	Yes	Ellisco
Total Waste Counted Towards Ranking					89.91		

AR000523

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date: 6/15/00****PRP Name: G. K. Garrett Corp.**

Invoice Date	Order Number	Invoice Number	Invoice Description	Material Description	Quantity	Counted Towards Ranking
3/3/82	357	10273	PAA 0129360	WASTE METHYLENE CHLORIDE	20.00	Yes
12/13/85	0	13369	NA	SOLDER FLUX	2.00	Yes
12/13/85	0	13369	NA	FLUX SOLUTION	1.00	Yes
12/13/85	0	13369	NA	FREON 11	1.00	Yes
12/13/85	0	13369	NA	ISOPROPANOL	1.00	Yes
12/13/85	NA	13369	NA	LUNCOTIN	0.09	Yes
12/13/85	0	13369	NA	1,1,1 TRICHLOROETHANE	2.00	Yes
12/13/85	0	13369	NA	SOLDER OIL	0.36	Yes
Total Waste Counted Towards Ranking					27.45	

AR000524

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Glah Bros., Inc.

3/14/83	577	11099	PAA 4766182	WASTE PERCHLORETHYLENE	2.00	Yes
7/18/83	NA	NA	PAA 4767092	PERCHLORETHYLENE	1.00	Yes
Total Waste Counted Towards Ranking					3.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Gulf & Western

Event Date	Order Number	Invoice Number	Invoice Number	Waste Description	Quantity	Count Towards Ranking
3/1/85	1257	12780	PAB 00890643	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
Total Waste Counted Towards Ranking					2.00	

AR000526

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: High Energy Company

2/17/76	3844	NA	NA	TRICHLORETHYLENE	3.00	Yes
5/31/85	1374	NA	PAB 00891505	WASTE METHYLENE CHLORIDE & 1,1,1 TRIC	5.00	Yes
5/31/85	1373	12960	PAB 00891505	WASTE TRICHLORETHYLENE	11.00	Yes
6/7/85	4406	12984	NA	TRICHLORETHYLENE	8.64	Yes
6/7/85	4406	12984	NA	RECLAIMED SAF-T-SOLVENT	3.00	Yes
4/18/86	1705	13615	PAB 2263214	WASTE TRICHLORETHYLENE	16.00	Yes
10/6/87	2254	14605	PAB 4770894	MIXED SOLVENT	7.00	Yes
10/6/87	2253	14605	PAB 4770894	TRICHLORETHYLENE	9.00	Yes
11/19/87	2306	14694	PAB 5248574	WASTE FREON, ISOPROPANOL, & METHYLE	7.00	Yes
11/19/87	2307	14694	PAB 5248574	WASTE TRICHLORETHYLENE	4.00	Yes
12/8/88	2717	15367	PAB 5911754	WASTE FREON, ISOPROPANOL, & METHYLE	7.00	Yes
12/8/88	2718	15367	PAB 5911754	WASTE TRICHLORETHYLENE	4.00	Yes
Total Waste Counted Towards Ranking					84.64	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Hulltronics

Inv Dt	Order Number	Inv No	Material	Waste Description	Quantity	Counted
2/23/82	353	10260	NA	WASTE TRICHLORETHYLENE	1.00	Yes
9/16/82	467	10727	NA	MIXED SOLVENT	1.00	Yes
Total Waste Counted Towards Ranking					2.00	

AR000528

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date: 6/15/00****PRP Name: J & J Spill**

3/19/81	0		139	CARBON TETRACHLORIDE, TRICHLOROETH	5.00	Yes
9/11/81	0		PAA3210491	TRICHLOROETHANE & METHYLENE CHLOR	20.00	Yes
10/26/81	291		PAA3210351	TRICHLOROETHYLENE	3.00	Yes
2/19/82	351		PAA 0756663	MIXED CHLORINE SOLVENT, FLAMMABLES	6.00	Yes
2/19/82	350		PAA 4461693	TRICHLOROETHANE, TRICHLOROETHYLENE	9.00	Yes
Total Waste Counted Towards Ranking					43.00	

AR000529

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: J & J Spill

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number				
11/12/80	8240	8420	NA	TCE	1.00	Yes	Leeds & Northrop
1/27/81	8361		PAA 0112630	CARBON TETRACHLORIDE	0.55	Yes	Leeds & Northrop
1/27/81	8361		PAA 0112641	TRICHLORETHYLENE	1.00	Yes	Leeds & Northrop
1/27/81	130	8361	NA	MIXED SOLVENTS	1.00	Yes	Leeds & Northrop
2/25/81	NA	8411	NA	CARBON TETRACHLORIDE	0.36	Yes	Leeds & Northrop
2/25/81	NA	8411	NA	MIXED TRICHLORETHYLENE	0.18	Yes	Leeds & Northrop
2/25/81	NA	8411	NA	MIXED TRICHLORETHYLENE	2.00	Yes	Leeds & Northrop
2/25/81	NA	8411	NA	TRICHLORETHYLENE	2.00	Yes	Leeds & Northrop
3/19/81	139	8453	NA	CARBON TETRACHLORIDE	0.36	Yes	Leeds & Northrop
3/19/81	139	8453	NA	MIXED SOLVENTS	4.36	Yes	Leeds & Northrop
4/7/81	164	8488	PAA 0025664	WASTE SOLVENT MIXTURE	5.00	Yes	Aydin
5/7/81	185	8572	PAA0076764	CARBON TETRACHLORIDE	0.36	Yes	Leeds & Northrop
5/7/81	185	8572	PAA0076764	TRICHLOROETHYLENE, MIXED SOLVENTS	4.55	Yes	Leeds & Northrop
6/23/81	8651	8651	PAA 0077335	WASTE WATER	1.00	Yes	Leeds & Northrop
6/25/81	8652	8652	PAA 0077346	TRICHLOROETHYLENE, WATER	1.00	Yes	Leeds & Northrop
6/25/81	213	8652	NA	WASTE WATER	2.00	Yes	Leeds & Northrop
9/11/81	8799	8799	PAA 3210572	1-1-1 and MX	20.00	Yes	Leeds & Northrop
9/14/81	0	N/A	PAA 3210546	TRICHLORETHYLENE	3.00	Yes	Aydin
9/14/81	0	N/A	PAA 3210550	TRICHLOROETHANE	8.00	Yes	Aydin
12/17/81	0	10119	PAA 3211040	PERCHLOROETHANE, TRICHLORETHYLENE.	5.00	Yes	Leeds & Northrop
12/17/81	320	10119	NA	CARBON TETRACHLORIDE	1.00	Yes	Leeds & Northrop
2/19/82	350	10241	PAA 4461693	TRICHLORETHANE, TRICHLOROETHYLENE	7.00	Yes	Aydin
2/19/82	350	10241	PAA 4461704	TRICHLORETHYLENE	2.00	Yes	Aydin
3/8/82	360	10290	PAA 4660573	TRICHLOROETHANE	1.00	Yes	Aydin

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: J & J Spill

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Volume	Yes	Company
3/8/82	360	10290	PAA 4660573	WASTE 1,1,1 TRICHLOROETHANE	0.82	Yes	Aydin
3/15/82		10327		MIXED CHLORINATED SOLVENTS	3.00	Yes	Leeds & Northrop
3/15/82		10327		PAINT SOLIDS AND WATER	1.00	Yes	Leeds & Northrop
3/15/82	351	10327	PAA0756663	FLAMMIBLES AND MIXED SOLVENTS	1.00	Yes	Leeds & Northrop
3/15/82	351	10327	PAA0756663	WASTE FLAMMABLES	1.00	Yes	Leeds & Northrop
3/17/82	369	10430	PAA 0137266	CARBON TETRACHLORIDE	5.00	Yes	Polysciences
3/17/82	369	10430	PAA 0137266	WASTE CHLOROFORM	11.00	Yes	Polysciences
3/17/82	369	10430	PAA 0137266	WASTE METHYLENE CHLORIDE	4.00	Yes	Polysciences
3/31/82	374	10350	PAA 4461273	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes	Fluid Power, Inc.
4/15/82	0	10383	PAA 4461354	MIXED CHLORINATED SOLVENT	4.00	Yes	Leeds & Northrop
4/29/82	394	10431	PAA 4461553	METHYLENE CHLORIDE MIXED WITH METH	7.00	Yes	Polysciences
10/26/82		10021		TRICHLORETHYLENE	3.00	Yes	Leeds & Northrop
Total Waste Counted Towards Ranking					115.54		

AR0000531

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Keystone Transformer

Inv Date	Order Number	Inv Number	Material Name	Waste Description	Quantity	Ranking
1/18/83	540	10997	PAA 4765832	WASTE POLYESTER RESIN	2.00	Yes
1/18/83	540	10997	PAA 4765832	WASTE VARNISH	2.00	Yes
Total Waste Counted Towards Ranking					4.00	

AR000532

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Kosempel

1/28/91	NA	3449	PAC 2937701	WASTE TRICHLORETHYLENE, PERCHLORETI	11.00	Yes
6/21/91	NA	3553	PAC 2938666	TRICHLOROETHYLENE, PERCHLOROETHYLE	2.00	Yes
Total Waste Counted Towards Ranking					13.00	

AR000533

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Leeds & Northrop

11/12/80	8240	8420	NA	TCE	1.00	Yes
1/27/81	8361		PAA 0112630	CARBON TETRACHLORIDE	0.55	Yes
1/27/81	8361		PAA 0112641	TRICHLOROETHYLENE	1.00	Yes
1/27/81	130	8361	NA	MIXED SOLVENTS	1.00	Yes
2/2/81	0		PAA 0025373	TRICHLOROETHYLENE	10.00	Yes
2/25/81	NA	8411	NA	CARBON TETRACHLORIDE	0.36	Yes
2/25/81	NA	8411	NA	TRICHLOROETHYLENE	2.00	Yes
2/25/81	NA	8411	NA	MIXED TRICHLOROETHYLENE	0.18	Yes
2/25/81	NA	8411	NA	MIXED TRICHLOROETHYLENE	2.00	Yes
3/19/81	139	8453	NA	MIXED SOLVENTS	4.36	Yes
3/19/81	139	8453	NA	CARBON TETRACHLORIDE	0.36	Yes
5/7/81	185	8572	PAA0076764	TRICHLOROETHYLENE, MIXED SOLVENTS	4.55	Yes
5/7/81	185	8572	PAA0076764	CARBON TETRACHLORIDE	0.36	Yes
6/23/81	8651	8651	PAA 0077335	WASTE WATER	1.00	Yes
6/25/81	8652	8652	PAA 0077346	TRICHLOROETHYLENE, WATER	1.00	Yes
6/25/81	213	8652	NA	WASTE WATER	2.00	Yes
9/11/81	8799	8799	PAA 3210572	1-1-1 and MX	20.00	Yes
12/17/81	0	10119	PAA 3211040	PERCHLOROETHANE, TRICHLOROETHYLENE.	5.00	Yes
12/17/81	320	10119	NA	CARBON TETRACHLORIDE	1.00	Yes
3/15/82		10327		MIXED CHLORINATED SOLVENTS	3.00	Yes
3/15/82	351	10327	PAA0756663	WASTE FLAMMABLES	1.00	Yes
3/15/82		10327		PAINT SOLIDS AND WATER	1.00	Yes
3/15/82	351	10327	PAA0756663	FLAMMABLES AND MIXED SOLVENTS	1.00	Yes
4/15/82	0	10383	PAA 4461354	MIXED CHLORINATED SOLVENT	4.00	Yes
7/2/82	0		PAA 4678074	TRICHLOROFLUOROTHANE, ACETONE, XYL	14.00	Yes
9/15/82	0		PAA 6443194	CELLUSOLVE, WATER	2.00	Yes
9/15/82	0		PAA 6443183	TRICHLOROETHANE, TRICHLOROETHYLENE,	12.00	Yes
10/26/82		10021		TRICHLOROETHYLENE	3.00	Yes
3/9/83	0		PAA 6443553	TRICHLOROETHANE, FREON	7.00	Yes
3/9/83	0		PAA 6443511	XYLENE, TOLUENE, MEK, ACETONE, PROPO	15.00	Yes
3/10/83	0		PAA 6443544	METHYLENE CHLORIDE, LIQUID NOS	4.00	Yes
6/14/83	648		NA	WASTE WATER	2.00	Yes
6/14/83	648		NA	WASTE WATER	2.00	Yes
6/14/83	648		NA	CARBON TETRACHLORIDE	1.00	Yes
6/14/83	648		NA	WASTE LACQUER THINNER	10.00	Yes
6/14/83	648		NA	WASTE FREON	5.00	Yes

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Leeds & Northrop

6/14/83	648		NA	1,1,1 TRICHLOROETHANE	1.00	Yes
Total Waste Counted Towards Ranking					145.72	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Lightman Drum Co.

11/6/84		1147	PAB00730752	MC	0.27	Yes
				Total Waste Counted Towards Ranking	0.27	

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: Lightman Drum Co.

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Quantity	Counted Towards Ranking	Receiver
7/13/81	223	8689	PAA 1230880	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes	Mack Wayne Plastics
7/13/81	223	8689	PAA 1230880	WASTE OIL	2.00	Yes	Mack Wayne Plastics
7/13/81	224	8690	PAA1230891	WASTE 1,1,1 TRICHLOROETHANE	9.00	Yes	Prodelin Inc.
8/13/81	239	8747	PAA0013008	WASTE 1,1,1 TRICHLOROETHANE	12.00	Yes	Jetshapes Inc.
8/13/81	239	8747	PAA0013008	WASTE LUBRICATING OIL	15.00	Yes	Jetshapes Inc.
11/10/81	301	10054	PAA 0129511	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes	Mack Wayne Plastics
11/10/81	302	10053	NJ 0056027	WASTE 1,1,1 TRICHLOROETHANE	4.00	Yes	Mack Wayne Plastics
Total Waste Counted Towards Ranking					48.00		

AR000537

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Malco

Invoice Date	Order Number	Invoice Number	Material Name	Description	Quantity	Excluded From Ranking
10/7/83	740	11587	PAA 4767910	WASTE TRICHLORETHYLENE	7.00	Yes
10/7/83	740	11587	PAA 4767910	WASTE AMMONIUM HYDROXIDE	1.00	Yes
10/7/83	740	11587	PAA 4767910	NON HAZARDOUS WASTE OIL	1.00	Yes
10/22/84	4177	12477	NA	TRICHLORETHYLENE	2.00	No
1/31/85	4274	12694	NA	TRICHLORETHYLENE	2.00	No
2/6/85	1240	12710	PAB 890374	WASTE TRICHLORETHYLENE	5.00	Yes
8/23/85	1452	13144	PAB 892216	WASTE TRICHLOROETHANE	6.00	Yes
5/2/86	1727	13645	PAB 2263472	WASTE WATER	2.00	Yes
5/2/86	1728	13645	PAB 2263472	EMPTY DRUMS	16.00	No
5/2/86	1729	13645	PAB 2263472	WASTE OIL AND WATER	2.00	No
5/2/86	1726	13644	PAB 2263472	WASTE TRICHLORETHYLENE	4.00	Yes
1/7/88	5317	14791	NA	NEW 1-1-1 TRICHLOROETHANE	0.04	Yes
1/7/88	2365	14790	PAB 5249020	WASTE TRICHLORETHYLENE	11.00	Yes
10/18/88	63479		NA	TRICHLOROETHYLENE, OIL	9.00	Yes
12/14/88	2721	15376	PAB 5911813	WASTE OIL	2.00	Yes
12/14/88	2720	15376	PAB 5119813	WASTE TRICHLORETHYLENE	8.00	Yes
12/16/88	2723	15377	PAB 5911850	WASTE TRICHLORETHYLENE	1.00	Yes
4/18/89	2852	15575	PAB 5910623	WASTE TRICHLORETHYLENE	6.00	Yes
4/18/89	2852	15575	PAB 5910623	WASTE TRICHLORETHYLENE	1.00	Yes
3/19/90	3218	16234	PAC 1670535	WASTE TRICHLORETHYLENE	6.00	Yes
3/19/90	3218	16234	PAC 1670535	WASTE TRICHLORETHYLENE	2.00	Yes
2/11/91	3723	17376	PAC 4869222	WASTE XYLENE	1.00	Yes
2/11/91	3722	17376	NJA 1032151	WASTE OIL	1.00	Yes
2/11/91	3724	17376	PAC 4869222	WASTE ACID LIQUID	1.00	Yes
2/11/91	3721	17376	NJA 1032151	WASTE TRICHLORETHYLENE	1.00	Yes
7/18/91	3574	17060	PAC 2938876	WASTE OIL	2.00	Yes
7/18/91	3575	17060	PAC 2938876	WASTE TRICHLORETHYLENE	6.00	Yes
7/18/91	3575	17060	PAC 2938876	WASTE TRICHLORETHYLENE	1.00	Yes
8/5/91	3590	17092	PAC 2938983	WASTE TRICHLORETHYLENE	1.00	Yes
11/18/91	3666	17250	PAC 48668791	WASTE LUB OIL	1.00	Yes
11/18/91	3664	17250	PAC 48668791	WASTE TRICHLORETHYLENE	3.00	Yes
11/18/91	3665	17250	PAC 48668791	WASTE WASH WATER	4.00	Yes
Total Waste Counted Towards Ranking					94.04	

AR000538

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Matheson Instrument

5/20/82	407	10462	PAA1094914	WASTE LACQUER THINNER	1.00	Yes
5/20/82	407	10462	PAA1094914	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
7/7/82	432	10543	PAA4765025	WASTE FREON	3.00	Yes
9/27/82	473	10752	PAA4426973	WASTE FREON	3.00	Yes
11/1/83	764	11647	PAA4768164	WASTE 1,1,1 & FREON MIXTURE	4.00	Yes
2/22/84	872	11900	PAA4769166	WASTE FREON	3.00	Yes
5/24/84	975	12132	PAA4769984	WASTE FREON	1.00	No
5/24/84	976	12132	PAA4769590	WASTE MERCURIC BROMIDE SOLUTION	0.55	Yes
8/14/84	1051	12324	PAA2559631	WASTE FREON & 1,1,1 TRICHLOROETHANE	3.00	Yes
4/19/85	1323	12867	PAB00891181	WASTE MERCURIC BROMIDE	0.55	Yes
1/15/87	4976	14099	NA	EMPTY POLY DRUMS	0.55	No
6/5/87	2145	14392	NA	WASTE METHANOL & MERCURIC BROMIDE	0.55	No
1/12/88	2372	14797	NJA0388122	WASTE METHANOL & MERCURIC BROMIDE	0.55	No
11/29/88	2707	15350	NJA0391181	WASTE METHANOL & MERCURIC BROMIDE	0.55	No
5/21/90	6936	16351	NA	NEW EMPTY OPEN TOP DRUM	2.00	No
Total Waste Counted Towards Ranking					20.10	

AR000539

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: McClarin Plastics

2/17/84	869	11898	PAA 4769155	WASTE ACETONE	3.00	Yes
2/17/84	868	11899	PAA 4769133	WASTE ACETONE	5.00	Yes
2/17/84	868	11899	PAA4769133	WASTE WATER & ACETONE	1.00	Yes
3/30/84	901	12000	PAA 4769354	WASTE ACETONE	6.00	Yes
3/30/84	900	12001	PAA 4769365	WASTE ACETONE	6.00	Yes
5/1/84	944	12082	PAA 4769726	WASTE ACETONE	4.00	Yes
5/1/84	945	12083	PAA 476975	WASTE ACETONE	5.00	Yes
6/19/84	1004	12191	PAA 2559126	WASTE ACETONE	6.00	Yes
6/19/84	1003	12192	PAB 2559255	WASTE ACETONE	6.00	Yes
8/22/84	1062	12340	NA	WASTE ACETONE	5.00	Yes
8/22/84	1063	12341	NA	WASTE ACETONE	6.00	Yes
11/8/84	1149	12525	PAB 00889593	WASTE ACETONE	4.00	Yes
11/8/84	1150	12524	PAB 00889582	WASTE ACETONE	6.00	Yes
1/25/85	1218	12671	PAB 00890330	WASTE ACETONE	6.00	Yes
1/25/85	1219	12673	PAB 00890326	WASTE ACETONE	6.00	Yes
2/28/85	1253	12756	PAB 00890654	WASTE ACETONE	3.00	Yes
2/28/85	1252	12755	PAB 00890621	WASTE ACETONE	6.00	Yes
5/2/85	1338	12899	PAB 00891236	WASTE ACETONE	4.00	Yes
5/2/85	1339	12900	PAB 00891225	WASTE ACETONE	6.00	Yes
6/26/85	1393	13019	PAB 00891564	WASTE ACETONE	5.00	Yes
6/26/85	1392	13018	PAB 00891752	WASTE ACETONE	6.00	Yes
10/2/85	1487	13293	PAB 00892021	WASTE ACETONE	8.00	Yes
10/2/85	1487	13293	PAB00892021	WASTE ACETONE (WITH SOLIDS)	2.00	Yes
10/2/85	1488	13294	PAB 00892290	WASTE ACETONE	5.00	Yes
10/2/85	1488	13294	PAB00892290	WASTE ACETONE (WITH SOLIDS)	1.00	Yes
11/22/85	1548	13332	PAB 00892651	WASTE ACETONE	3.00	Yes
11/22/85	1547	13331	PAB 00892813	WASTE ACETONE	6.00	Yes
2/3/86	1625	13470	PAB 2262606	WASTE ACETONE	5.00	Yes
2/3/86	1624	13471	PAB 2262595	WASTE ACETONE	8.00	Yes
4/11/86	1699	13601	PAB2263203	WASTE ACETONE (WITH SOLIDS)	2.00	Yes
4/11/86	1699	13601	PAB 2263203	WASTE ACETONE	5.00	Yes
4/11/86	1698	13602	PAB 2263192	WASTE ACETONE	9.00	Yes
6/10/86	1763	13727	PAB 2261770	WASTE ACETONE	2.00	Yes
6/10/86	1763	13727	PAB2261770	WASTE ACETONE (ALL SOLIDS)	2.00	Yes
6/10/86	1763	13727	PAB2261770	WASTE ACETONE (3-6" SOLIDS)	1.00	Yes
6/10/86	1762	13725	PAB 2261781	WASTE ACETONE (0-2" SOLIDS)	4.00	Yes

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Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: McClarin Plastics

6/10/86	13725	13725	PAB2261781	WASTE ACETONE (3-6" SOLIDS)	2.00	Yes
5/12/87	2123	14383	PAB4770021	SOLIDS	4.04	Yes
5/12/87	2123	14383	PAB 4770021	WASTE ACETONE	21.00	Yes
Total Waste Counted Towards Ranking					195.04	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Model Finishing

2/15/83	561	11052	PAA 4766075	WASTE TRICHLORETHYLENE	2.00	Yes
11/23/83	790	11707	PAA 4768116	WASTE TRICHLORETHYLENE	2.00	Yes
12/21/83	816	11777	PAA 4768562	WASTE TRICHLORETHYLENE	1.00	Yes
12/21/83	816	11777	PAA 4768562	OFF SPEC. TRI	1.00	Yes
11/29/84	1172	12567	PAB 00889781	WASTE TRICHLORETHYLENE	1.00	Yes
1/6/86	1578	13401	PAB 00892522	WASTE TRICHLORETHYLENE	1.00	Yes
10/29/86	1906	13988	PAB 2262853	WASTE TRICHLORETHYLENE	1.00	Yes
1/28/88	2388	NA	PAB 4769844	WASTE TRICHLORETHYLENE	3.00	Yes
1/28/88	5351	NA	NA	TRICHLORETHYLENE	2.00	No
12/8/88	2716	15368	PAB 5250125	WASTE TRICHLORETHYLENE	1.00	No
12/8/88	2716	15368	PAB 5250125	WASTE TRICHLORETHYLENE	1.00	Yes
4/6/89	2835	15559	PAB 5911791	WASTE TRICHLORETHYLENE	1.00	Yes
8/8/89	5847	15800	PAB 5911463	WASTE TRICHLORETHYLENE	2.00	No
8/8/89	2990	15800	PAB 5911463	TRICHLORETHYLENE	1.00	Yes
3/12/90	3209	16222	PAC 1786702	WASTE TRICHLORETHYLENE	2.00	Yes
5/4/90	3260	16318	PAC 1670826	WASTE TRICHLORETHYLENE	2.00	Yes
8/10/90	3353	16527	PAC 1671191	WASTE TRICHLORETHYLENE	1.00	Yes
11/1/91	7335	17225	PAC 4868710	TRICHLORETHYLENE	1.00	No
11/1/91	3653	17225	PAC 4868710	WASTE TRICHLORETHYLENE	3.00	Yes
2/21/92	3736	17392	PAC 4869196	WASTE TRICHLORETHYLENE	1.00	Yes
2/21/92	6007	17392	PAC 4869196	TRICHLORETHYLENE	1.00	No
9/30/92	3875	17676	NJA 1496758	WASTE TRICHLORETHYLENE	1.00	Yes
Total Waste Counted Towards Ranking					25.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Narco Avionics

1/13/77	9465	NA	NA	DIRTY 1-1-1	9.00	Yes
9/2/77	4859	NA	NA	OIL	2.00	Yes
9/2/77	4859	NA	NA	1-1-1 AND TRI	8.00	Yes
9/2/77	4859	NA	NA	EMPTY DRUMS	4.00	No
Total Waste Counted Towards Ranking					19.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: National Metal Crafters

Invoice Date	Order Number	Invoice Number	Invoice Date	Waste Description	Quantity	Counted
11/24/82	480	10880	PAA 4765294	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
6/1/83	640	11296	PAA 4766882	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
5/17/85	1359	12931	PAB 00891402	WASTE TOULENE	2.00	Yes
5/17/85	1358	12931	PAB00891402	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
4/8/86	1691	13596	PAB 2263030	WASTE 1,1,1 TRICHLOROETHANE	4.00	Yes
4/10/86	1694	13599	PAB 2263170	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
Total Waste Counted Towards Ranking					16.00	

AR000544

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Ni-Chro

1/5/88	2362	14777	PAB5248670	WASTE TRICHLORETHYLENE	1.00	Yes
6/18/90	3301	16415	PAC1671073	WASTE TRICHLORETHYLENE	1.00	Yes
4/7/92	3773	17455	PAC6119610	WASTE TRICHLORETHYLENE	1.00	Yes
4/7/92	6037	17455	PAC6119610	TRICHLORETHYLENE	1.00	No
Total Waste Counted Towards Ranking					3.00	

AR000545

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Oxford Metal Products

2/19/82	0		PAA 1094634	TRICHLOROETHANE	14.00 Yes
8/12/82	456		PAA4636800	WASTE 1,1,1 TRICHLOROETHANE	3.00 Yes
				Total Waste Counted Towards Ranking	17.00

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Penn Airborn Product

10/8/82	478	10773	PAA 4427360	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
12/16/82	3420	10927	NA	1,1,1 TRICHLOROETHANE	1.31	Yes
10/25/83	753	11628	NA	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
10/25/83	754	11628	NA	WASTE ACETONE	1.00	Yes
1/28/85	1221	12675	PAB 00890304	WASTE ACETONE & LACQUER THINNER	1.00	Yes
1/28/85	1220	12675	PAB 00890304	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
5/20/86	1747	13694	PAB 2261615	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/20/87	2311	14696	PAB 5248622	WASTE ACETONE & LACQUER THINNER	1.00	Yes
11/20/87	2312	14696	PAB 5248622	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/4/88	2680	15312	PAB 5911511	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
9/19/89	3037	15894	PAC 1280285	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
3/1/90	3190	16205	PAC 1671445	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
7/6/90	3317	16457	PAC1671180	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
7/6/90	3318	16457	PAC 1671180	WASTE ACETONE, PAINT, & LACQUER THIN	1.00	Yes
Total Waste Counted Towards Ranking					15.31	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Penske V.D.A

6/6/80	32		NA	SOLVENT	8.00	Yes
Total Waste Counted Towards Ranking					8.00	

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: Philadelphia Steel Drum Co. Inc.

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Quantity	Counted Toward Ranking	Generator Name
2/24/82	354	10253	PAA 0141945	WASTE METHYLENE CHLORIDE	13.00	Yes	Gas Springs
4/25/83	584	11186	PAA 4473125	WASTE METHYLENE CHLORIDE	6.00	Yes	Gas Springs
4/5/84	909	12011	PAA 4473195	WASTE METHYLENE CHLORIDE	4.00	Yes	Gas Springs
11/27/85	1556	13338	PAB 01171715	WASTE METHYLENE CHLORIDE	12.00	Yes	Contamination Control, Inc.
5/29/86	1752	13706	PAB 2166846	WASTE METHYLENE CHLORIDE & PAINT	8.00	Yes	Contamination Control, Inc.
Total Waste Counted Towards Ranking					43.00		

AR0000549

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Philco Ford

7/20/71	7762	3079		1,1,1 TRICHLOROETHANE	6.00	Yes
Total Waste Counted Towards Ranking					6.00	

AR000550

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Precision Arts Mfg.

Invoice Date	Order Number	Invoice Number	Material Name	Waste Description	Quantity	Count Toward Ranking
3/17/86	1661	13549	PAB 2262912	WASTE TRICHLORETHYLENE	2.00	Yes
10/12/89	3063	15951	PAC 1280440	WASTE TRICHLORETHYLENE	1.00	Yes
				Total Waste Counted Towards Ranking	3.00	

AR000551

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Princo Instruments Inc.

Transaction Date	Transaction ID	Site ID	Product Code	Product Name	Quantity	Disposition
10/19/81	3011	10008	NA	1,1,1 TRICHLOROETHYLENE	1.00	No
10/19/81	3011	10008	NA	MINERAL SPIRITS	1.00	No
10/19/81	287	10007	PAA 1094343	1,1,1 TRICHLOROETHANE	1.00	Yes
10/19/81	287	10007	PAA 1094343	WASTE OIL	1.00	Yes
10/19/81	287	10007	PAA 1094343	WASTE MINERAL SPIRITS	1.00	Yes
3/9/82	361	10291	PAA 1094660	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
3/9/82	361	10291	PAA 1094660	WASTE MINERAL SPIRITS	1.00	Yes
5/13/82	401	10447	PAA 1094870	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
8/11/82	455	10650	PAA 4667386	WASTE MINERAL SPIRITS	2.00	Yes
10/8/82	479	10774	PAA 4498034	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/16/82	511	10871	PAA 4765552	WASTE MINERAL SPIRITS	1.00	Yes
2/14/83	554	11038	PAA 4765972	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
2/14/83	554	11038	PAA 4765972	WASTE MINERAL SPIRITS	1.00	Yes
2/14/83	554	11038	PAA 4765972	WASTE OIL	1.00	Yes
3/30/83	594	11144	PAA 4766333	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
6/7/83	644	11300	PAA 4766941	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
6/7/83	644	11300	PAA 4766941	WASTE MINERAL SPIRITS	2.00	Yes
9/14/83	719	11541	PAA 4767685	WASTE MINERAL SPIRITS	1.00	Yes
9/14/83	719	11541	PAA 4767685	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
12/1/83	799	11722	PAA 4767560	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
12/1/83	798	11722	PAA 4767560	WASTE MINERAL SPIRITS	1.00	Yes
3/19/84	897	11969	PAA 4769111	WASTE MINERAL SPIRITS	1.00	Yes
3/19/84	896	11969	PAA 4769111	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
5/22/84	968	12127	PAA 4769881	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
5/22/84	969	12127	PAA 4769881	WASTE PETROLEUM NAPHTHA	1.00	Yes
8/6/84	1047	12308	PAA 2559421	WASTE PETROLEUM NAPHTHA	1.00	Yes
8/6/84	1048	12308	PAA 2559421	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
10/22/84	1125	12480	PAB 00889261	WASTE PETROLEUM NAPHTHA	1.00	Yes
10/22/84	1124	12480	PAB 00889261	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
1/9/85	1204	12639	PAB 00890201	WASTE PETROLEUM NAPHTHA	1.00	Yes
1/9/85	1205	12639	PAB 00890201	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
3/7/85	1269	12800	PAB 00890551	WASTE MINERAL SPIRITS (PETROLEUM NA	1.00	Yes
3/7/85	1270	12786	PAB 00890551	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
5/22/85	1361	12946	PAB 00890945	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
7/1/85	1400	13029	PAB 00891450	WASTE MINERAL SPIRITS	1.00	Yes
10/3/85	1492	13227	PAB 00892474	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes

AR000552

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Princo Instruments Inc.

12/4/85	1559	13348	PAB 00893200	WASTE 1,1,1 TRICHLOROETHANE	2.00	Yes
12/4/85	1558	13348	PAB 00893200	WASTE PETROLEUM NAPHTHA	4.00	Yes
1/20/86	1600	13436	PAB 00893502	WASTE PETROLEUM NAPHTHA	1.00	Yes
1/20/86	1599	13436	PAB 00893502	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
3/5/86	1652	13534	PAB 2262691	WASTE PETROLEUM NAPHTHA	1.00	Yes
3/5/86	1653	13534	PAB 2262691	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
5/1/86	1724	13654	PAB 2263446	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
6/11/86	1766	13732	PAB 2261652	WASTE PETROLEUM NAPHTHA	1.00	Yes
8/5/86	1816	13827	PAB 2262223	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
10/3/86	1688	13942	PAB 2262352	WASTE PETROLEUM NAPHTHA	1.00	Yes
10/3/86	1887	13942	PAB 2262352	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
12/9/86	1949	14057	PA 3087000	WASTE LUBRICATING OIL	1.00	Yes
12/9/86	1948	14057	PAB 3087000	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
3/31/87	2074	14248	PAB 3051543	WASTE PETROLEUM NAPHTHA	1.00	Yes
3/31/87	2075	14248	PAB 3051543	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
8/10/87	2207	14509	PAB 4769936	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
10/19/87	2278	14639	PAB 4771071	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
2/26/88	2408	14882	PAB 5248600	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
2/26/88	2407	14882	PAB 5248600	WASTE PETROLEUM NAPHTHA	2.00	Yes
6/3/88	2513	15054	PAB 5249882	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
10/20/88	2647	15273	PAB 5726873	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
1/24/89	2765	15431	PAB 5911522	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
4/5/89	2833	15554	PAB 5912502	WASTE PETROLEUM NAPHTHA	2.00	Yes
5/3/89	2877	15606	PAB 5910785	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
6/12/89	2927	15690	PAB 5911032	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/10/89	3091	16009	PAB 5911334	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
12/15/89	3128	16082	NJA 0391199	HYDROFLUORIC ACID	3.00	No
2/9/90	3174	16175	PAC 1671432	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
7/3/90	3312	16439	PAC 1670605	WASTE PETROLEUM NAPHTHA	1.00	Yes
7/3/90	3313	16439	PAC 1670605	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
11/6/90	3408	16682	PAC 2937513	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
6/2/91	7209	16994	PAC 2937830	1,1,1 TRICHLOROETHANE	1.00	No
6/2/91	7209	16994	PAC 2937830	RECONDITIONED EMPTY DRUM	1.00	No
6/2/91	3547	16994	PAC 2937830	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
9/16/91	3623	17155	PAC2938950	WASTE LUB OIL	1.00	Yes
9/16/91	7298	17155	PAC2938950	1,1,1 TRICHLOROETHANE	1.00	No

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Princo Instruments Inc.

1/14/92	7400	17329	PAC4868754	METHANOL	1.00	No
1/14/92	3693	17329	PAC4868754	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
1/14/92	5891	17329	PAC4868754	1,1,1 TRICHLOROETHANE	1.00	No
3/20/92	3757	17428	PAC1789944	WASTE MINERAL SPIRITS	2.00	Yes
3/20/92	6024	17428	PAC1789944	1,1,1 TRICHLOROETHANE	1.00	No
6/10/92	6105	17555	NJA1388635	EMPTY PLASTIC DRUM	1.00	No
6/10/92	3820	17555	NJA1388635	WASTE HYDROFLUORIC ACID	2.00	No
Total Waste Counted Towards Ranking					79.00	

AR000554

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Prodelin Inc.

7/13/81	224	8690	PAA1230891	WASTE 1,1,1 TRICHLOROETHANE	9.00	Yes
				Total Waste Counted Towards Ranking	9.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: R C Kletzing

9/1/82	463	10709	PAA 4765176	WASTE 1,1,1 TRICHLOROETHANE	2.50
				Total Waste Counted Towards Ranking	2.50

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Sermetal

10/28/80	79	8210	NA	1,1,1 TRICHLOROETHANE, OIL, AND WATER	6.00	Yes
Total Waste Counted Towards Ranking					6.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Shur-Kut Supply Corp.

3/25/88	2445	14928	PAB 5249296	WASTE WATER SOLUBLE OIL	2.00	Yes
1/24/90	3159	16140	PAC 1787026	WASTE WATER SOLUBLE OIL	2.00	Yes
9/7/90	3367	16579	PAC2937373	WATER SOLUBLE OIL	3.00	Yes
Total Waste Counted Towards Ranking					7.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Solid State Scientific

10/7/80	2567	8175	NA	EPOXY RESINS	3.00	Yes
10/7/80		8175	NA	SULFURIC ACID, SPENT (KTI)	2.00	Yes
10/7/80	2567	8175	NA	CORROSIVE LIQUIDS & SOLIDS, N.O.S.	4.00	Yes
10/7/80	2567	8175	NA	POISONOUS LIQUIDS & SOLIDS, N.O.S.	2.00	Yes
10/7/80	2567	8175	NA	OXIDIZERS	1.00	Yes
10/7/80	2567	8175	NA	FLAMMABLE LIQUID, N.O.S.	1.00	Yes
10/15/80		8192	NA	POISONOUS LIQUIDS & SOLIDS, N.O.S.	3.00	Yes
10/15/80		8192	NA	CORROSIVE LIQUIDS & SOLIDS, N.O.S.	2.00	Yes
10/15/80		8192	NA	OXIDIZERS	2.00	Yes
11/17/80		8253	NA	SULFURIC ACID, SPENT	2.00	Yes
11/17/80		8253	NA	WASTE FREON, HAZARDOUS WASTE, LIQUID	2.00	Yes
11/17/80		8253	NA	WASTE HALOGENATED SOLVENTS	1.00	Yes
11/17/80		8253	NA	HAZARDOUS WASTE, LIQUID. NOS.	2.00	Yes
11/17/80		8253	NA	POISONOUS LIQUIDS & SOLIDS, N.O.S.	2.50	Yes
11/17/80		8253	NA	FLAMMABLE LIQUID, N.O.S.	0.50	Yes
11/17/80		8253	NA	CORROSIVE LIQUIDS & SOLIDS, N.O.S.	1.00	Yes
11/17/80		8253	NA	OXIDIZERS, N.O.S.	1.00	Yes
Total Waste Counted Towards Ranking					32.00	

Malvern TCE Superfund Site: Comprehensive Transaction Report**Run Date:** 6/15/00**PRP Name:** Storm Weather Products

Event Date	Order Number	Invoice Number	Invoice Description	Quantity	Ranking
9/26/83	727	11559	PAA 4767744	WASTE 1,1,1 TRICHLOROETHANE	2.00 Yes
12/14/83	807	11753	PAA 4768444	WASTE 1,1,1 TRICHLOROETHANE	3.00 Yes
2/6/84	859	11872	PAA 4769015	WASTE 1,1,1 TRICHLOROETHANE	2.00 Yes
3/8/84	887	11948	PAA 4769295	WASTE 1,1,1 TRICHLOROETHANE	2.00 Yes
5/2/84	947	12086	PAA 4769752	WASTE 1,1,1 TRICHLOROETHANE	2.00 Yes
6/28/84	1022	12217	PAA 2559395	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	3.00 No
9/23/84	1065	12376	PAA 2559826	WASTE 1,1,1 TRICHLOROETHANE (SOLID)	3.00 No
10/2/84	1098	12428	PAB 00889055	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	3.00 Yes
1/2/85	1199	12624	PAB 00889943	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	4.00 No
2/12/85	1244	12723	PAB 00890422	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	3.00 Yes
3/22/85	1290	12825	PAB 00890886	1,1,1 TRICHLOROETHANE, POLYURETHANE	3.00 Yes
5/17/85	1357	12926	PAB 00891251	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	3.00 Yes
7/2/85	1403	13034	PAB 00891892	WASTE 1,1,1 TRICHLOROETHANE, POLYURE	3.00 Yes
Total Waste Counted Towards Ranking				26.00	

AR000560

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: U.S. Environmental Services

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Quantity	Counted Toward Ranking	Generator Name
9/7/90	3369	16577	PAC 2937384	WASTE MINERAL SPIRITS, OIL & GREASE	4.00	Yes	E. Hopkins Co.
Total Waste Counted Towards Ranking					4.00		

AR000561

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: Waste Consulting & Brokerage

PRP Type: Transporter

Invoice Date	Order Number	Invoice Number	Manifest Number	Waste Description	Volume	Accepted for Ranking	PRP Name
7/16/84	1030	12248	PAA 12435546	WASTE 1,1,1 TRICHLOROETHANE	5.36	Yes	S K F Industries Inc.
Total Waste Counted Towards Ranking					5.36		

AR000562

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Xynatech Inc.

7/27/90	3338	16492	PAC 2937093	WASTE XYLENE AND MINERAL SPIRITS	10.00	Yes
2/20/91	3490	16857	PAC 2938143	XYLENE & MINERAL SPIRITS	10.00	Yes
8/26/91	3606	17121	PAC 4868356	XYLENE & PETROLEUM NAPHTHA	10.00	Yes
4/1/93	3973	17891	NJA 1560689	WASTE XYLENE	9.00	Yes
Total Waste Counted Towards Ranking					39.00	

AR000563

Enclosure H
Small Business Regulatory and
Enforcement Fairness Act Information Sheet

AR000564



Office of Enforcement and Compliance Assurance **INFORMATION SHEET**

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

Hazardous Waste/Underground Tanks/
Superfund
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants
Information
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

Continued on back



Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

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